

2016

Program Review

California Overhead Conversion Program, Rule 20A For Years 2011-2015

The Billion Dollar Risk!

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Program Review

California Overhead Conversion Program

Rule 20A

Policy and Planning Division

California Public Utilities Commission



November 23, 2016



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California Overhead Conversion Program (Rule 20A): Program Performance Review for 2011 - 2015

Program Description

This review examines the current administration of the California Public Utilities Commission Rule 20A Overhead Utility Conversion Program by the three large California investor-owned electric utilities, Pacific Gas and Electric Company (PGE), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDGE). Each utility administers this program independently and provides program and project management support to all local jurisdictions within its service territory. This program has been in operation for almost 50 years and resulted supporting municipal overhead utility conversion projects that has resulted in the undergrounding of over 2500 miles of utilities in areas where it is in the public interest, e.g. scenic areas, major thoroughfares, state parks. Despite this record, past general rate case proceedings, state legislation, and municipalities have raised issues with the program in terms of it being properly administered in a fair and timely manner that meets current local and State objectives.

This program is essentially a utility credit program, a financial program that provides “credits” to a local government. Each utility is given an allotment of credits to distribute to its respective municipalities every year. These Rule 20A credits enable the municipality and utility to work on qualified projects with the utility responsible for the planning, design, and construction aspects of removing overhead infrastructure and placement in an underground trench. The utility is compensated for project costs by collecting the municipality’s accumulated credits and including them in subsequent general rate cases so that the electric rates charged to all customers within their service territory will cover the submitted Rule 20A expenses. When initially established, this utility credit program was intended to provide these conversions projects with an assured secure funding source. Statewide, over 500 California municipalities receive Rule 20A credit allocations on an annual basis from their respective utility, with an annual allocation of over \$95 million of credits distributed to local jurisdictions every year.

Program Performance Issues

While Rule 20A has been effective in meeting its original goal of facilitating conversion projects that are in the public interest, credits have been allocated annually to municipalities over many years using a formula that does not take into account whether a municipality has any planned overhead conversion projects. As a result, sizable credit balances have built up over the years, cumulatively totaling to over \$1 billion in liabilities and pose a potential financial risk to utility ratepayers.

Purpose of this Study

CPUC’s Rule 20 program defines the policies and procedures for the conversion of overhead power lines and other equipment to underground facilities where there is a public interest to do so. Over the past 20 years there have been various efforts to alter how Rule 20A has been administered by California’s three largest investor-owned electric utilities. Recently, a California utility incurred significant financial losses due to cost overruns associated with the Rule 20A program. This program has been in existence for nearly 50 years but has never been revised to better address the current needs of the State.

This program review is intended to 1) provide the CPUC an extensive evaluation of how the program is being administered by each utility, 2) describe its history over the past five years, and 3) identify where there may be deficiencies or potential liabilities associated with the current program administration and status. Finally, this review provides recommendations for how the CPUC should move forward to improve program management and performance.



Concurrently, some cities and counties have had projects where project costs exceeded their accrued credit balance for that municipality, resulting in a negative credit balance or debt, with utility costs not being compensated and in some cases taken as a loss, in one case resulting in a utility writing of over \$20 million in losses. In addition, municipalities have been engaged in a secondary, unregulated, credit market, where Rule 20A credits are loaned from one municipality to other municipalities so that the borrower may build up credit balances to cover their conversion project costs. The fact that municipalities feel compelled to create this credit market indicates that the current program is not meeting local needs.

Purpose of the Performance Review

This review examines the current program, using data provided by each utility to assess how Rule 20A credit allocations and balances are distributed to local governments throughout the three service territories of the utilities. Project histories were also collected from SCE and SDGE to serve as a representative sample size to estimate the number of Rule 20A projects and costs that each utility is engaged in on an annual basis.

Establish Performance Metrics

Based on CPUC staff's review of program data, currently there are 186 municipalities that have negative balances, i.e. credit debt due to projects that had cost overruns which exceeded their cumulative credit balance. In addition, the utilities are not allocating credit to municipalities that have not met the program criteria nor the necessary preparations needed for completing a successful capital project. Rule 20 regulations specifically require that a city or county hold public hearings on any proposed project and adopt an ordinance creating an underground utility district. This review found that 352 of the 501 jurisdictions, 70% of all accounts, do not have either a plan for overhead conversion projects or an approved underground utility district.

Compile Program Balanced Scorecard

Finally, this review utilized an established performance management tool, the Balance Scorecard (BSC), to evaluate program management by the three utilities, using measureable key risk factors to assess performance and determine an overall performance score. Based on the results from the BSC, two utilities, PGE and SCE, have underperformed in their administration of the program for the years 2011-2015.

Review Findings

The Balanced Scorecard provided a defensible means of measuring program performance. Four key risk factors, 1) compliance, 2) negative balance, 3) low balance or allocation, and 4) program reporting are described in this review. Based on program data provided by the utilities, two programs have scores that indicate insufficient program and project management.

Rule 20A Program Balanced Scorecard

Utility	Compliant Municipalities	Municipalities with Negative Balance	Municipalities with Low Balance or Allocation < \$1M	Program Reporting	Overall Score
PGE	3.6	22.5	15.6	5	46.7
SCE	10.7	17.3	13.5	0	41.5
SDGE	24	20.5	14.8	25	84.3



Review Recommendations

Based on this review, the Policy and Planning Division and the Energy Division recommend that the CPUC take the following actions:

- ◆ Establish triennial program performance review of the Rule 20A Program if it is maintained in its current form.
- ◆ Conduct a financial audit of each utility's administration of Rule 20A program. This audit should examine: 1) how utilities determine allocations amounts from year to year for each municipal account, 2) whether municipalities are receiving credits but have no intentions of or need for participating in the program, and 3) why so many projects have cost overruns, 4) how best to resolve current deficits, and prevent future overruns.
- ◆ Request municipalities that intend to conduct conversion projects in the next five to ten years but do not meet program criteria to indicate whether they still have an interest in participating in the program and to specify actions to meet program criteria.
- ◆ For jurisdictions that do not meet program criteria and do not plan to pursue any conversion projects in the next five to ten years, the respective utility should suspend these accounts with no annual allocations to those municipalities until such time when they indicate an interest in conversion projects with supporting documentation and approvals. For those credits that would have gone to suspended accounts, the utilities should redistribute these credits to the remaining active accounts.
- ◆ Issue an Order Instituting Rulemaking (OIR) to initiate a proceeding to either update Rule 20A to incorporate appropriate program and project management improvements that will improve performance or replace with a program that is administratively less burdensome and more responsive and accountable in its support of municipal conversion projects.
- ◆ Prepare Performance Reviews of the other Rule 20 programs, 20B, 20C and 20D.



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Figure 1 - [Los Angeles Bureau of Power and Light](#) workers setting overhead utilities in early 1900s

1.0 Introduction – A History of Overhead Conversion Projects in California

With the electrification of the California landscape in the late 19th and early 20th centuries, overhead utility poles became a ubiquitous icon of its urban environment. Often times, this infrastructure was built in a manner that did not take into consideration its impact on the community or environment. However, by the early 20th century California municipalities began to remove overhead utility lines by undergrounding in public streets to reduce urban blight, preserve and protect the natural and urban landscape.

The first municipal ordinance directing the conversion of overhead utilities by undergrounding was adopted by the Los Angeles City Council in 1907. Sixty years later, as part of a wave of landmark environmental measures, Governor Ronald Reagan signed into law the nation's first State overhead

conversion program in 1967. Known as Rule 20A, it was designed to enable undergrounding overhead electric utilities in locations where undergrounding would be in the public interest. This program sought to establish a structured means of allowing overhead conversion projects in a consistent manner throughout the State with the costs covered by utility ratepayers. Over the past 49 years, it is estimated that 2500 miles of overhead utility lines have been converted in California under the program.

2.0 The Cost of Conversion Projects

It is important to note that the cost of converting overhead distribution lines to underground varies by location. The table below provides a range of estimated costs according to the Edison Electric Institute. The conversion costs range from \$93,000 per mile for rural construction to \$5 million per mile for urban construction. These estimates are based on a national study.

Table 1
Cost per Mile: Converting Overhead to Underground Distribution¹

	Urban	Suburban	Rural
Minimum	\$1,000,000	\$313,600	\$158,100
Maximum	\$5,000,000	\$2,420,000	\$1,960,000

Notes: Urban – 150+ customers per square mile; Suburban – 51-149 customers per square mile; Rural – 50 or fewer customers per square mile

One example of the costs of conversion projects in California is the City of San Francisco's overhead conversion project from 1996 to 2006 which consisted of converting 46 miles of overhead utility lines. This project took 10 years and when completed had a total cost of \$173 million, costing \$3.8 million per mile. To get a better sense of costs throughout the State, CPUC staff requested overhead conversion

¹ Hall, Kenneth L., **Out of Sight, Out of Mind**, Edison Electric Institute 2012



project data for the last ten years from two investor-owned utilities, Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDGE). SCE and SDGE provided information on the annual costs of Rule 20A projects within their service territory for 10 years from 2006 to 2015.

For SCE, total annual Rule 20A project costs averaged over \$27 million over the past ten years, SDGE averaged \$23 million. The spending on individual conversion projects averaged from \$2.7 to \$2.9 million per year. The graph below shows that in recent years SCE has spent more annually on Rule 20A projects while SDGE annual spending has declined. Also note that while SCE has 192 municipalities participating in its Rule 20A program, the highest number participating in a given year was 17. Similarly, SDGE has 27 program participants; the highest number with conversion projects in any given year was 11.

Table 2 – SCE and SDGE Rule 20A Annual Project Costs 2006-2015

Year	SCE Annual Spend	No. of Projects	Avg Cost per Project	SDGE Annual Spend	No. of Projects	Avg Cost per Project
2006	\$10,321,689	6	\$1,720,282	\$60,563,654	11	\$5,505,787
2007	\$28,308,114	9	\$3,145,346	\$16,628,548	8	\$2,078,569
2008	\$42,538,523	14	\$3,038,466	\$26,269,648	5	\$5,253,930
2009	\$17,883,603	12	\$1,490,300	\$24,201,459	11	\$3,457,351
2010	\$38,870,716	9	\$4,318,968	\$34,997,612	9	\$3,888,624
2011	\$37,061,633	17	\$2,180,096	\$13,879,418	8	\$1,734,927
2012	\$20,602,430	10	\$2,060,243	\$9,439,979	10	\$943,998
2013	\$28,248,521	8	\$3,531,065	\$25,951,346	9	\$2,883,483
2014	\$27,700,984	9	\$3,077,887	\$3,759,506	4	\$939,877
2015	\$21,020,409	8	\$2,627,551	\$15,341,930	6	\$2,556,988
Total	\$272,556,622	102	\$2,719,020	\$231,033,100	81	\$2,924,353

Figure 2

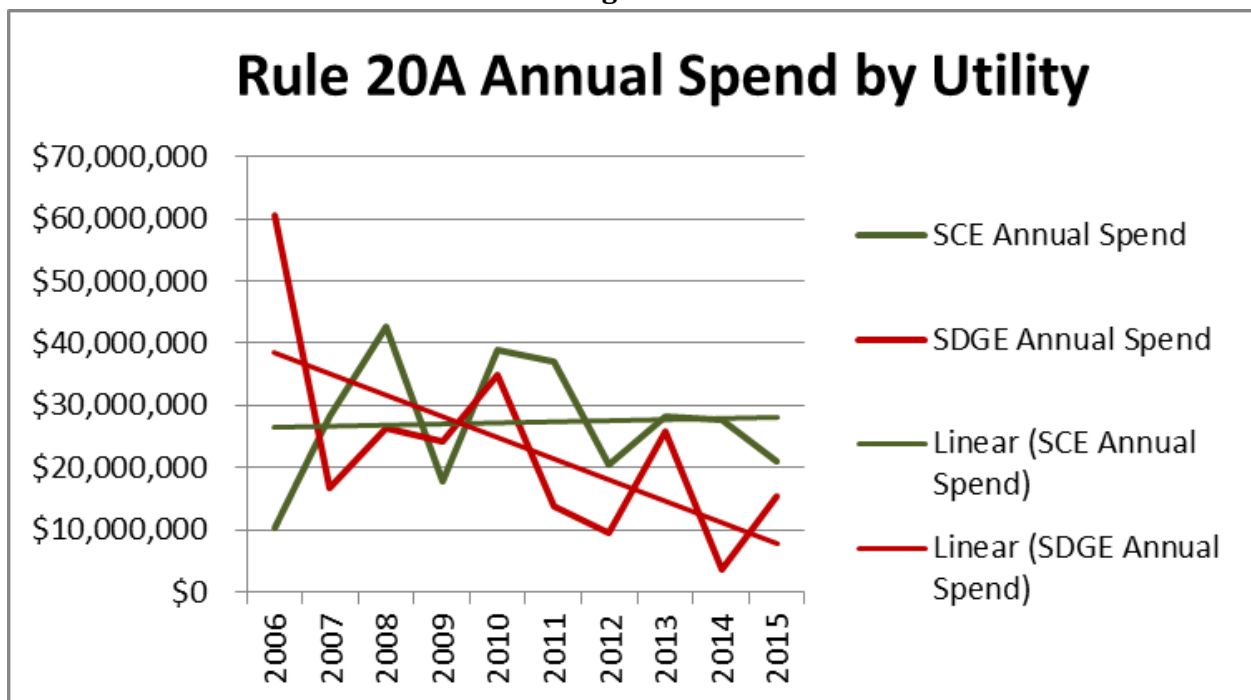
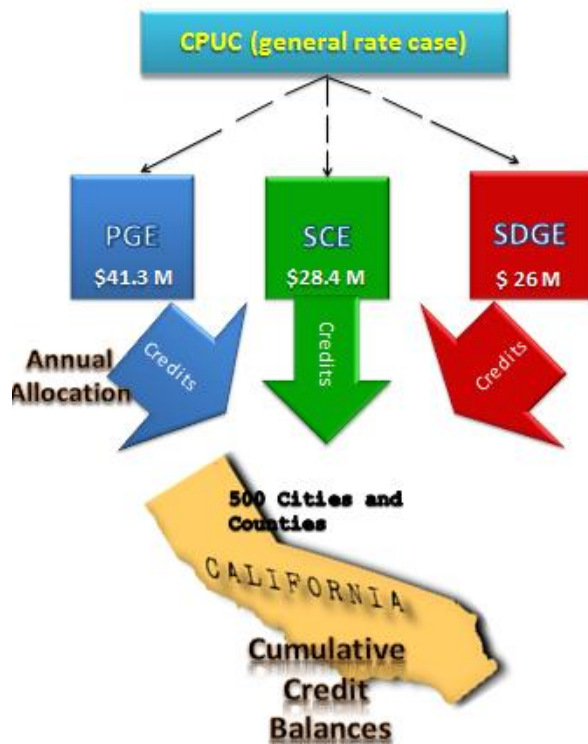




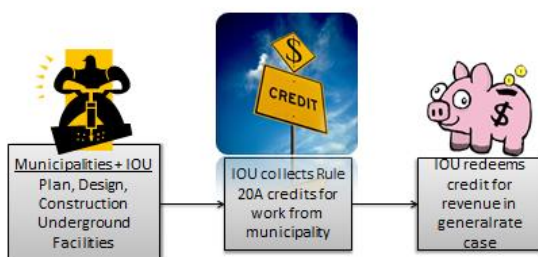
Figure 3 - How Rule 20A Works



revenue via general rate case proceedings.

As it was originally designed, a municipality that has developed a conversion plan and established an underground utility district with city council approval is given an annual allocation of credits by the utility based on a formula that takes into account the number of utility meters within the municipality compared to the utility's service territory. These allocations are then set aside by the municipality and when the cumulative balance of credits is sufficient to cover the cost of a conversion project, the municipality and its utility can move forward with the planning, design and construction of taking down the overhead utilities and placing underground. Currently there are over 500 local jurisdictions, California city and county governments that receive an annual allocation of credits from their utility. In this program, the utilities serve the role of bank or credit union, responsible for the allocation of credits to municipalities in its service territory, managing accounts, tracking credits for completed work, and recovery of revenue.

Figure 4 - How Rule 20A Works (cont)



3.0 California's Rule 20A Program for Overhead Conversion Projects

Rule 20A is part of Electric Tariff Rule 20. The California Public Utilities Commission's (CPUC) Rule 20 program defines the policies and procedures for the conversion of overhead power lines and other equipment to underground facilities. There are four separate programs under Rule 20, as shown in Table 3 below.

Similar to the Federal National Mortgage Association (FNMA), commonly known as *Fannie Mae*, or Federal Home Loan Mortgage Corporation (FHLMC), known as *Freddie Mac*, whose mission is to facilitate home ownership through mortgage lending, Rule 20A established a credit system through which local government could work with California investor-owned utilities (IOUs) on the undergrounding of overhead electric utilities in public areas. The program allows utilities to be compensated for its planning, design and construction costs without the need for municipal funding by linking Rule 20A credits to utility

The Rule 20A program was first developed in the late 1960s and was viewed as an environmental initiative, a means for environmental improvement and beautification, enabling overhead conversion projects in a consistent manner throughout California in public areas blighted by urban congestion. When first developed, Rule 20A was recognized as a new and unique program but with uncertainty over its implementation and impact.

Under Rule 20A all planning, design and construction work is performed by the



participating utility and once completed, the utility is compensated based on the project costs, which are to be covered using the local government’s Rule 20A credits. The utilities then receive compensation for the credits through subsequent general rate case proceedings.

TABLE 3 Electric Tariff Rule 20			
<i>Rule</i>	<i>Ratepayer Contribution</i>	<i>Municipality or Third Party Contribution</i>	<i>Criteria</i>
20A	80-100%	Max 20%: cost from street to meter	Public Interest
		Min 0%: if use main line funds	
20B	20%	80%	N/A
20C	minimal	100%	Typically small projects
20D	80%	Max 20%: cost from street to meter	Facilities within SDG&E Fire Threat Zone
		Min 0%: if use main line funds	

In order for a project to qualify for the Rule 20A program, in addition to meeting the requirements of having a conversion plan and underground utility district, the project itself must have a public benefit and meet the following criteria:

- ✦ Eliminate an unusually heavy concentration of overhead lines;
- ✦ Involve a street or road with a high volume of public traffic;
- ✦ Benefit a civic or public recreation area or area of unusual scenic interest; and,
- ✦ Be listed as an arterial street or major collector as defined in the Governor’s Office of Planning and Research (OPR) Guidelines.

It is interesting to note that at least one utility has modified this original list and added another qualifying condition: whether wheelchair access is limited or impeded by overhead lines and poles².

Table 4
Annual Rule 20A Credit Allocations by IOU

Utility	Number of Rule 20A municipalities	Budgeted Allocation (millions)	Actual Annual Allocations 2015	Avg. No. of Rule 20A projects per year	Avg. Annual Rule 20A Spend
PGE	282	\$41.3	\$43,506,023	Not Available	Not Available
SCE	192	\$28.4	\$37,154,543	10	\$27,255,662
SDGE	27	\$26.0	\$26,273,308	8	\$23,103,310
Total	501	\$95.7	\$106,933,874		

² SDGE Rule 20 Tariff



Table 5

Rule 20A Regions and Associated Counties

Bay Area Region

Alameda County
Contra Costa County
Marin County
Napa County
San Francisco County
San Mateo County
Santa Clara County
Solano County
Sonoma County

Central Coast Region

Monterey County
San Benito County
San Luis Obispo County
Santa Barbara County
Santa Cruz County

Central Valley Region

Fresno County
Glenn County
Kern County
Kings County
Lassen County
Madera County
Merced County
Nevada County
Placer County
Sacramento County
San Joaquin County
Shasta County
Stanislaus County
Sutter County
Tulare County
Yolo County
Yuba County

Desert Region

Imperial County
Inyo County
Mono County

Inland Empire Region

Riverside County
San Bernardino County

North State Region

Alpine County
Butte County
Humboldt County
Lake County
Mendocino County
Sierra County
Siskiyou County
Trinity County

Sierras/ Foothills Region

Amador County
Calaveras County
El Dorado County
Mariposa County
Nevada County
Placer County
Tuolumne County

Los Angeles/Ventura Region

Los Angeles County
Ventura County

Orange County/San Diego Region

Orange County
San Diego County



Previously Identified Issues with the Rule 20A Program

In the late 1990s, it became clear to stakeholders and the California legislature that the Rule 20A program needed to be updated to reflect the current needs of the State. In 1999, the legislature passed a law mandating that the CPUC review and revise Rule 20A. In the early 2000s the CPUC began a review of the program, breaking it into two phases. At the end of the first phase which was focused on immediate changes that could improve the program, including allowing municipalities to mortgage up to five years' worth of their annual credit allocation. Unfortunately, phase two of this review was indefinitely suspended and no more adjustments were made to Rule 20A.

Among the issues discussed during the first phase was broadening the Rule 20A criteria to consider public and fire safety, service reliability, economic development, and aesthetics. It was also noted that often times these conversion projects include telecommunication lines but are covered under a separate program, Rule 32 or Rule 40 depending on the telecommunications company, and integration of these two conversion programs would be desirable. Other concerns included updating a planning guide and creating an ombudsperson position within the CPUC to ensure that utilities are responsive to municipalities.

In 2011, the CPUC cut by half the annual allocations made by the PGE to municipalities in response to the growing accumulation of credits that exceeded nine years of annual allocation in 2010. This reduction was intended to stop the escalation of Rule 20A balances.

As previously described, the credit allocation to a municipality was originally based on the number of utility meters in a municipality compared to the utility's service territory. However, over the years that formula was changed and is now determined by a complex formula that is based on the allocation a city or county received in 1990.

Annual credit allocations for each utility are shown in Table 4, with these amounts set in each utility's general rate case. Currently, these credit allocations total \$95.7 million a year.

4.0 Statewide Review of the Rule 20A Program Credit Allocations and Balances

2011 – 2015

To evaluate the current status of the Rule 20A program, data was requested from the three utilities on annual allocations and credit balances for each participating city or county. This data was then aggregated by county, then by region and finally, by utility. The specific counties in each region are listed on the next page. The cumulative balances and annual allocations were then tabulated to provide a statewide representation of where credits are being provided by the utilities and the current balances of existing Rule 20A credits.

As shown in Table 6, based on utility data provided to the CPUC, all regions of the State, with the exception of the Desert Region, have sizable credit balances built up over the years, totaling over \$1 billion. Given that the average annual program costs based on SCE and SDGE data is \$25 million, if the program ended in 2016, in theory a balance of \$1 billion would provide resources for the next thirteen years. Conversely, there is some question as to whether some of the municipalities that hold Rule 20A credit balances have overhead conversion projects that are in the public interest. If that is the case, then a certain percentage of this outstanding credit balance could be retired to more accurately represent future conversion project costs.

Table 6 –Rule 20A Budgeted versus Actual Allocations

Utility	Number of Rule 20A municipalities	Total Annual Allocations 2015	Total Cumulative Balances	Avg. No. of Rule 20A projects per year	Avg. Annual Rule 20A Spend
PGE	282	\$43,506,023	\$748,463,510	Not Available	Not Available
SCE	192	\$37,154,543	\$145,161,469	10	\$27,255,662
SDGE	27	\$26,273,308	\$131,329,491	8	\$23,103,310
Total	501	\$106,933,874	\$1,024,954,470	9	\$25,179,486



4.1 Rule 20A Credit Review – Regional Accumulated Balances

Figure 5 on the next page shows the trends in the cumulative balances for all nine regions as defined in Table 7 over the past five years.

The total balance statewide is indicated with the blue line at the top and shows that despite a reduction in overall Rule 20A allocations to PGE five years ago, the overall balance has increased, particularly in the last three years, with it in excess of \$1 billion.

Looking at individual regional trends, while the Bay Area Region has had a decline in Rule 20A balance amounts, in Southern California, particularly in SCE service territory, there has been an increase in balances due to SCE's annual allocations which declined in 2013 and then increased in 2014 and 2015. At the same time, Rule 20A projects in SCE service territory have been fairly constant over the past five years.

Figure 6 lays out the distribution of Rule 20A monies by region, with the Bay Area and Central Valley having the highest balances by a significant margin. It is not clear whether the decrease in the Bay Area credit balance over the past five years is due to an increase in Rule 20A projects, writing off projects where PGE underestimated the Rule 20A project budgets, or the decrease in annual allocations.

Table 7
Rule 20A Cumulative Balances Aggregated by Region

Region	2011	2012	2013	2014	2015
Bay Area	\$392,692,828	\$424,316,094	\$369,656,703	\$367,710,853	\$357,485,341
Central Coast	\$86,332,654	\$93,252,639	\$89,374,223	\$89,564,256	\$92,220,655
Central Valley	\$238,124,858	\$246,189,581	\$249,955,885	\$244,183,035	\$245,386,559
Desert	\$1,146,500	\$1,233,160	\$1,363,503	\$598,968	\$736,555
Inland Empire	\$2,446,111	\$463,445	\$14,308,264	\$21,350,171	\$22,677,821
Los Angeles Ventura	\$45,430,674	\$51,229,447	\$68,160,918	\$84,673,032	\$101,542,015
North State	\$56,332,824	\$58,768,470	\$61,149,167	\$58,049,015	\$57,024,872
Orange County/San Diego	\$98,968,893	\$114,597,923	\$114,881,860	\$131,305,679	\$147,763,594
Sierra/Foothills	\$59,413,473	\$62,081,729	\$64,664,525	\$62,470,147	\$63,106,475
Total	\$980,888,816	\$1,052,132,487	\$1,033,515,050	\$1,059,905,155	\$1,087,943,887

Red cells denote balances > \$100,000,000



**Figure 5 - Rule 20A Balance History
2011 - 2015**

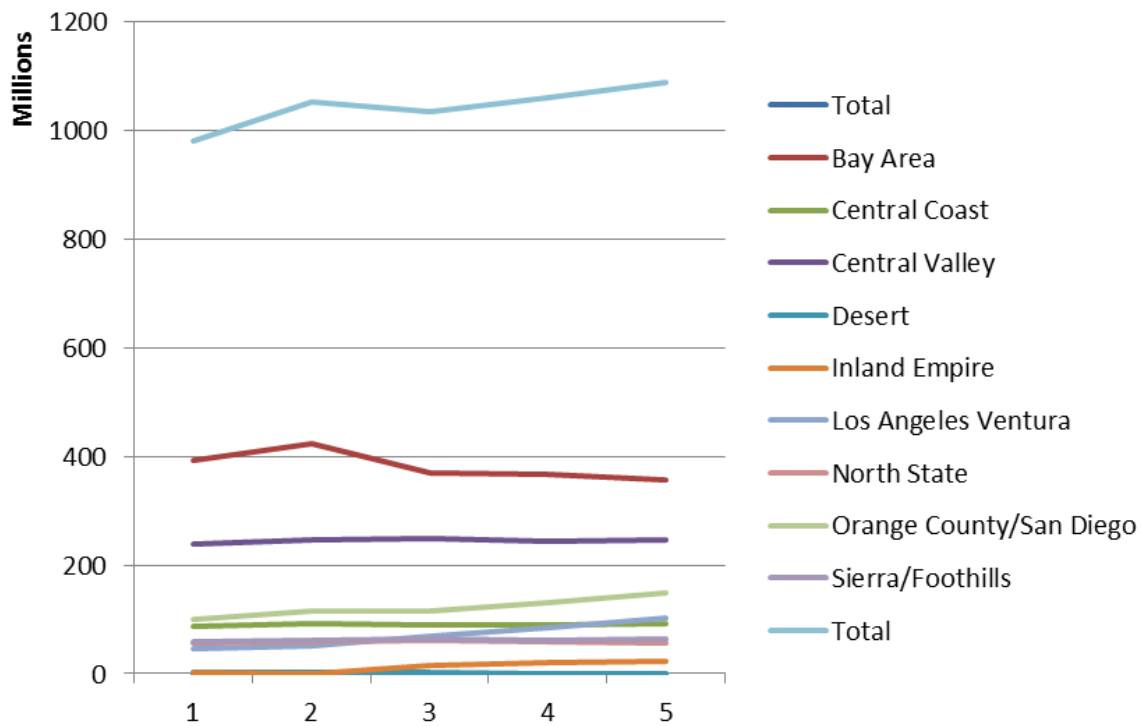
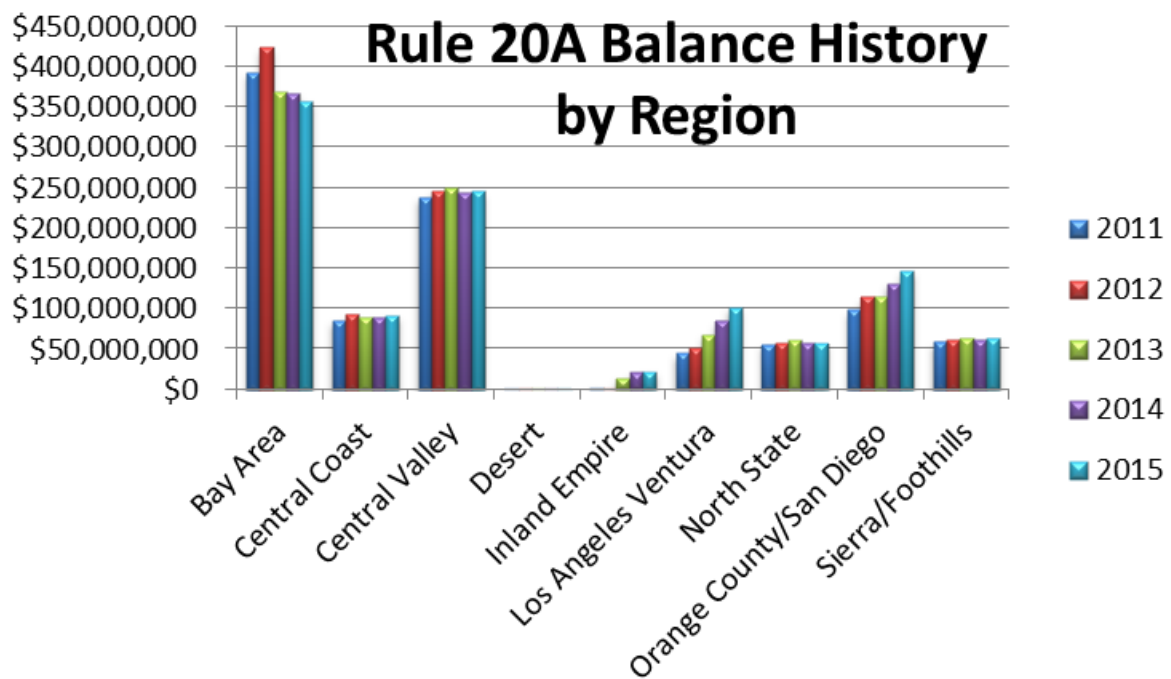


Figure 6





4.2 Regional Credit Review – Annual Allocations

While Table 8 below illustrates annual allocations aggregated by region Figure 8 on the next page illustrates allocations history by region. However, as Figure 7 also on the next page illustrates, a review of credit allocations by region reveals that while allocations in PGE and SDGE service territories were flat, there were fluctuations in allocations distributed by SCE. Despite having an annual budget amount of credits for distribution, SCE did not distribute all available credits, resulting in a pronounced dip in allocations in 2013. The reason for this decrease is not clear. It is also uncertain whether the subsequent increase in allocations, which exceeds the annual limit of \$95.7 million set by each utility's general rate case, is an attempt to compensate municipalities for the reduced allocation in 2013 by SCE. It is concerning that SCE has never reported this allocation issue and it is not clear whether municipalities were notified or were impacted by this fluctuation in annual allocations.

Table 8
Rule 20A Annual Allocations Aggregated by Region

Region	2011	2012	2013	2014	2015
Bay Area	\$21,791,877	\$21,777,188	\$21,767,130	\$21,880,342	\$21,913,926
Central Coast	\$4,663,813	\$4,673,996	\$4,498,214	\$4,727,711	\$4,739,760
Central Valley	\$12,291,834	\$12,337,774	\$11,793,719	\$12,451,282	\$12,509,958
Desert	\$116,451	\$118,361	\$86,659	\$130,344	\$135,464
Inland Empire	\$6,205,649	\$6,334,663	\$4,211,913	\$7,157,749	\$7,505,927
Los Angeles Ventura	\$19,472,525	\$19,795,650	\$14,572,092	\$21,787,722	\$22,627,480
North State	\$2,379,158	\$2,381,152	\$2,380,697	\$2,376,403	\$2,379,712
Orange County San Diego	\$28,971,800	\$29,184,589	\$26,364,957	\$30,507,723	\$32,153,304
Sierra/Foothills	\$2,609,044	\$2,608,687	\$2,608,772	\$2,620,837	\$2,629,698
Total	\$98,502,150	\$99,212,060	\$88,284,153	\$103,640,112	\$106,595,228

Cells in red denote regions receiving allocations that total more than \$10 million

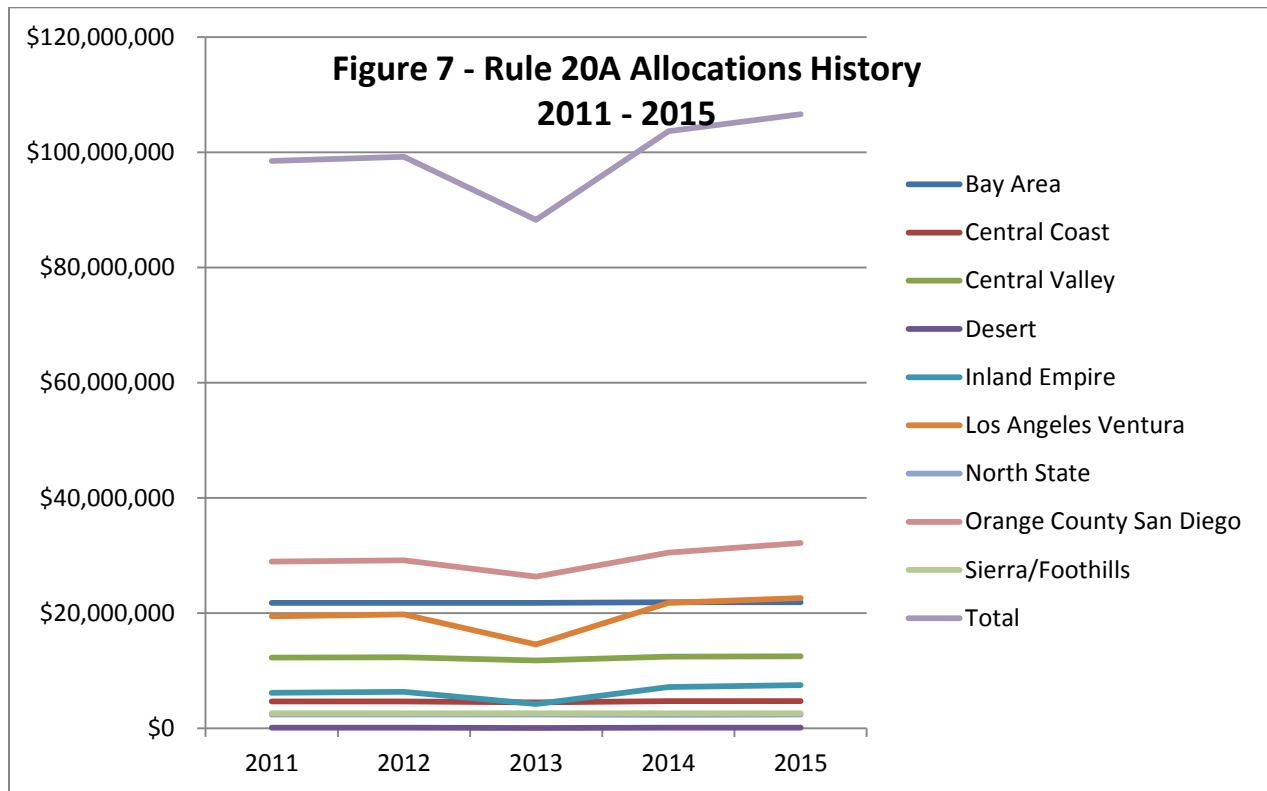
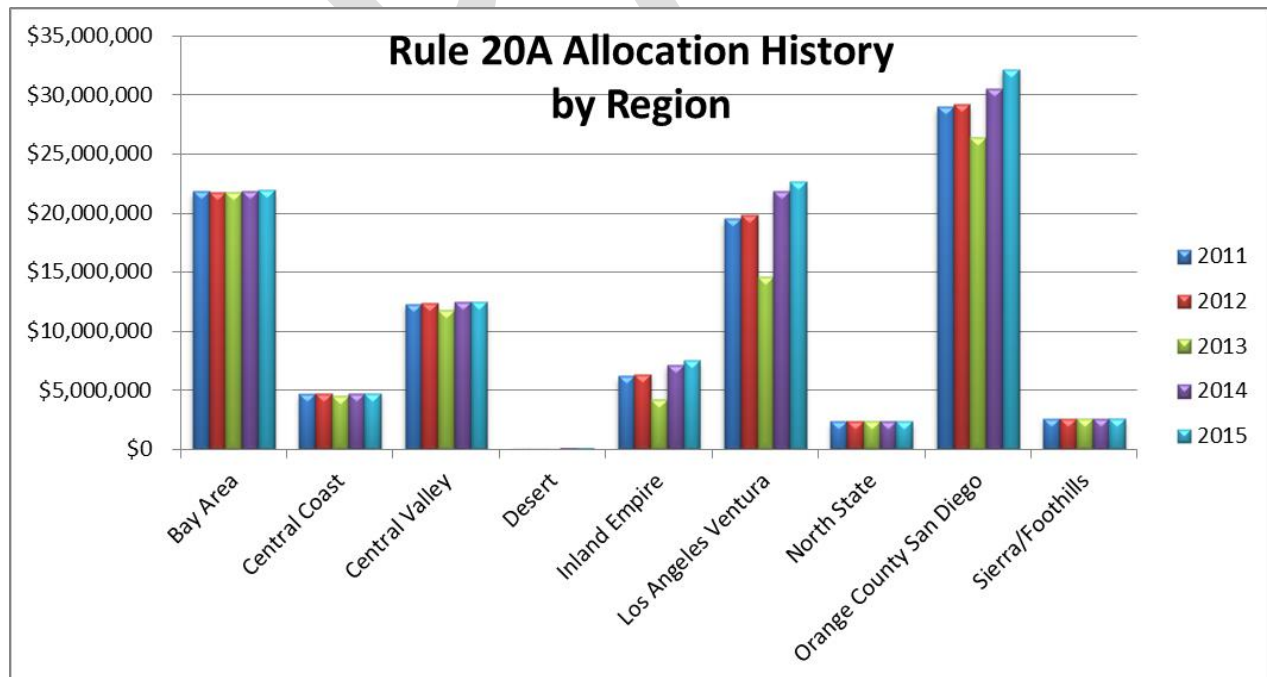


Figure 8

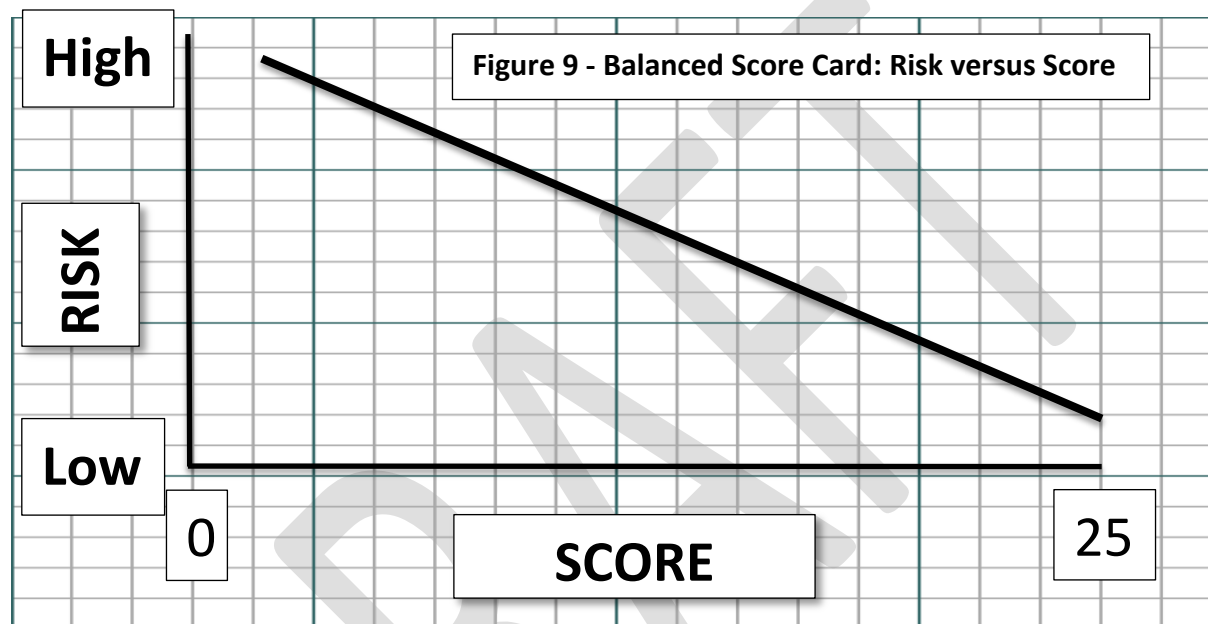




5.0 Balanced Scorecard and Key Risk Indicators

Beyond describing how Rule 20A credits are distributed by the utilities, this performance review examines program risk in terms of fiduciary and project management. Four key risk indicators were identified as being crucial determinants in assessing utility performance in administering this program according to CPUC rules and protocols. Those four indicators are:

1. Municipalities with negative balances
2. Jurisdictions not compliant with Rule 20A
3. Jurisdictions with insufficient Rule 20A credits
4. Utility program reporting



These four factors were determined by the Policy and Planning Division and the Energy Division to be the key risk indicators for the Rule 20A program. Each indicator has a total possible score of 25, with the highest possible overall score of 100. These factors are measurable and demonstrates how effectively a utility is providing sufficient financial and project management to its Rule 20A program. Each utility is scored for each risk factor based on 2015 data but the score takes into account 2011-2015 program performance as well. Where data indicated higher program risk for an individual risk factor, it received a lower score compared to a lower risk which receives a higher score.

These key risk indicators are described further below. These are then used to construct a “Balanced Scorecard” that rates utility performance based on the combined scores of the performance indicators. Balance scorecards have been in use in large corporations, government agencies, education institutions and nonprofits for the past 20 years and are shown to be the most used method for tracking and communicating organizational performance³. It was originated by Robert Kaplan of Harvard Business School and consultant David Norton in 1990s but the roots of the balanced scorecard can be linked to the pioneering work of General Electric on performance measurement reporting in the 1950s. It is an invaluable tool for managing programs with large constituencies and complex organizational processes.

³ Rigby, D., B. Bilodeau, “Ban and Company’s Management Tools and Trends Survey 2013,” April 7, 2014



5.1 Municipalities with Negative Balances

A fiduciary risk to both ratepayers and utility shareholders is the issue of negative balances. These occur when a municipality has not accumulated, borrowed or mortgaged enough Rule 20A credits to cover the cost of an overhead conversion project.

As an example, in 2015 PGE reported to the CPUC that 16 overhead conversion projects had cost overruns that totaled \$25 million which PGE unilaterally concluded would not be recovered from ratepayers. Table 9 lists the five highest overruns for PGE in 2014. The costs were instead incurred by PGE shareholders.

If a city or county does an underground conversion project but does not have an adequate amount of credits to cover the cost of the work, they incur a negative balance. As they accumulate annual allocations in future years, those credits go to paying down the negative balance. There are 86 municipalities with negative balances, totaling over \$117 million. Some negative balances are small and will be rectified within the next three years so long as their allocations stay at the current level. Table 10 below lists municipalities with credit debt where it would take 10 years or more to eliminate based on current annual allocations amounts.

Table 9
Top Five PGE Project Costs Overruns 2014

Jurisdiction	Balance (12-31-14)	5-Year Borrow	Balance + Borrow	As Built Cost	Costs in Excess of Credits
St Helena	\$4,803,891	\$925,820	\$5,729,711	\$17,077,667	(\$11,347,956)
Campbell	\$2,709,738	\$809,740	\$3,519,478	\$6,442,004	(\$2,902,526)
Anderson	\$1,117,164	\$202,970	\$1,320,134	\$3,333,987	(\$2,013,853)
Auburn	\$3,408,460	\$0	\$3,408,460	\$4,571,705	(\$1,163,245)
Riverbank	\$622,836	\$117,145	\$799,981	\$2,355,751	(\$1,555,770)

One of the ramifications of a negative balance is that a jurisdiction cannot conduct any future overhead conversions until the balance is sufficient to cover future project costs. For example, the City and County of San Francisco will not be able to conduct any overhead conversions for 17 years because of the negative balance that was incurred from the previously mentioned conversion project that ended in 2006. San Francisco's negative balance, the highest in the State, is in excess of \$50 million. Despite having the highest negative balance, as Table 10 shows, it is only 14th on the list. Given the current allocation amount, Napa County has the longest wait, where it will not eliminate its negative balance until 2093.



Table 10
Municipalities Where Debt Retirement \geq 10 Years

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Years to Retire	Utility
NAPA	NAPA COUNTY	\$155,792	(\$11,947,778)	(77)	PG&E
FRESNO	FIREBAUGH	\$17,587	(\$1,059,413)	(60)	PG&E
ORANGE	LAKE FOREST	\$23,318	(\$1,300,358)	(56)	SCE
SHASTA	ANDERSON	\$40,014	(\$2,176,117)	(54)	PG&E
STANISLAUS	RIVERBANK	\$35,173	(\$1,793,524)	(51)	PG&E
MARIN	BELVEDERE	\$6,108	(\$286,529)	(47)	PG&E
CALAVERAS	ANGELS CAMP	\$16,083	(\$690,660)	(43)	PG&E
LOS ANGELES	LA CANADA-FLINTRIDGE	\$96,006	(\$3,756,222)	(39)	SCE
SAN MATEO	HILLSBOROUGH	\$30,130	(\$978,587)	(32)	PG&E
SAN BERNARDINO COUNTY	Chino Hills	\$38,713	(\$914,250)	(24)	SCE
LOS ANGELES	MANHATTAN BEACH	\$203,912	(\$4,667,280)	(23)	SCE
SANTA CLARA	CAMPBELL	\$161,322	(\$3,558,670)	(22)	PG&E
FRESNO	FOWLER	\$16,400	(\$336,127)	(20)	PG&E
SAN FRANCISCO	SAN FRANCISCO	\$3,109,290	(\$53,760,782)	(17)	PG&E
MERCED	ATWATER	\$67,675	(\$1,145,734)	(17)	PG&E
MARIN	MILL VALLEY	\$62,100	(\$921,323)	(15)	PG&E
KINGS	LEMOORE	\$60,755	(\$671,713)	(11)	PG&E
LOS ANGELES	IRWINDALE	\$13,185	(\$142,013)	(11)	SCE
EL DORADO	PLACERVILLE	\$46,132	(\$473,985)	(10)	PG&E
LOS ANGELES	MALIBU	\$52,071	(\$529,310)	(10)	SCE
		\$4,251,766	(\$91,110,376)		20

For the Balanced Scorecard, the score for this indicator is computed by multiplying the percent of jurisdictions with positive balances by 25 for each utility.

5.2 Conversion Project Planning and Underground Utility Districts

For a municipality to participate in the Rule 20A program, it is prudent for it to produce an overhead conversion plan and required that it establish a utility underground district (UUD) approved by the city council. Based on information provided by the utilities, only 149 of the 502 jurisdictions or 30% of all jurisdictions have either an underground plan or utility underground district. For some jurisdictions in PGE's service territory, the utility has no knowledge about whether it has any underground plan. A total of 42 out of 282 jurisdictions (15%) within PGE service territory have a plan or UUD. It appears that no jurisdictions within SCE service territory have plans but 81 of 192 (42%) municipalities have UUDs. SDGE has 21 out of 27 jurisdictions (77%) with UUDs and five jurisdictions that have both a plan and UUD.

For the Balanced Scorecard, the score for this risk factor is determined by multiplying the percent of compliant municipalities in that utility's program by 25.



5.3 Insufficient Allocations and Balances

In reviewing the Rule 20A accounts it became clear that a large portion of the annual allocations made by each utility goes to urban areas where there may be a high demand for overhead conversion projects and an accompanying high costs associated with undergrounding in urban areas. But it is also evident that a large number of small, often rural, jurisdictions receive annual allocations and have cumulative balances that will make it difficult to accomplish any conversion projects within the foreseeable future. It is not clear whether these jurisdictions have any interest in specific conversion projects. If that is the case, the annual allocation of credits to these jurisdictions would be better spent on jurisdictions that have specific projects and meet program criteria or for retiring the debt for those jurisdictions with negative balances.

Overall, 269 jurisdictions (54%) of all jurisdictions receive allocations under \$100,000 per year. The number of jurisdictions fitting in this category and percent of all jurisdictions is included in the Balanced Scorecard to assess a utility's monitoring of Rule 20A accounts. There are 193 jurisdictions (39%) with Rule 20A balances that are less than \$1 million. Particularly for jurisdictions that meet Rule 20A criteria, it is important to have an accurate and reasonable knowledge of when Rule 20A balances will be sufficient to begin project development and minimize the risk of a project exceeding available Rule 20A credits.

For the Balanced Scorecard, the highest number of municipalities with a balance below \$1 million or an annual allocation less than \$100,000 for each utility is subtracted from the total number of participating jurisdictions and divided by the total number to get the percent of jurisdictions with sufficient funding. This percentage is then multiplied by 25 to determine the score for this key risk indicator.

5.4 Reporting

The last key risk indicator is reporting which entails a utility's performance in reporting program issues and performance and being responsive to and addressing municipalities' inquiries regarding Rule 20A. This is based on a review of utility Rule 20A correspondence from 2011 to 2015 and is a subjective score determined by the Policy and Planning Division and the Energy Division.



6.0 Rule 20A Performance Review – Pacific Gas & Electric

While PGE allocates credits to 282 jurisdictions within its service territory, the largest amount of these credits, over \$1 million per year, go to four jurisdictions,

1. San Francisco,
2. San Jose,
3. Oakland, and
4. City of Fresno.

Over \$43 million is allocated per year by PGE and the cumulative balances of all accounts are over \$748 million.

Regarding the key risk indicators, PGE Rule 20A program administration scores low due to the number of compliant municipalities, with 41 out of 282 jurisdictions or only 14 percent having underground plans or underground utility district. For municipalities with negative balances, 28 or 10 percent have negative balances. For municipalities with insufficient allocations and balances, PGE has the 38 percent with balance under \$ 1 million and 60 percent with allocations under \$100,000. PGE's score for reporting was zero due to the manner in which it reported its project cost overruns that resulted in a \$25 million loss. There had been no prior notification that those 16 projects had issues with insufficient credits and the CPUC was notified after the fact. Overall PGE scored a total performance score of 46.7 out of 100.

Table 11 - PGE Rule 20A Program Statistics

Utility	Number of Rule 20A municipalities	Total Annual Allocations 2015	Total Cumulative Balances	Avg. No. of Rule 20A projects per year	Avg. Annual Rule 20A Spend
PGE	282	\$43,506,023	\$748,463,510	Not Available	Not Available

Table 12 - PGE Rule 20A Balanced Score Card

Utility	No. of Compliant Municipalities	No. of Municipalities w Negative Balance	Total Negative Balance	No. of Municipalities w Balance < \$1M	No. of Municipalities w Allocations < \$100,000	Reporting	Overall Score
PGE	41 (14%)	28 (10%)	(\$84,520,120)	106 (38%)	170 (60%)		
Category	Compliance	Fiscal Risk		Available Resources		Reporting	
Score	3.6	22.5		15.6		5	46.7



Figure 10 - PGE 2015 Rule 20A Allocations

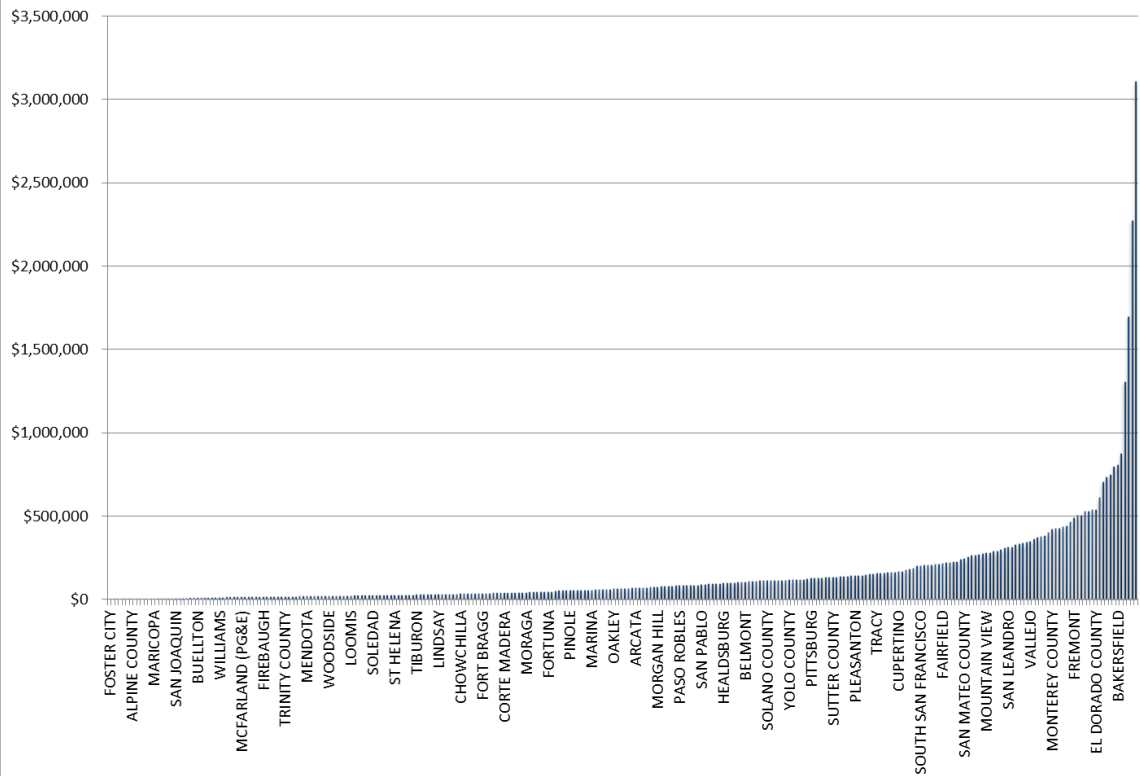
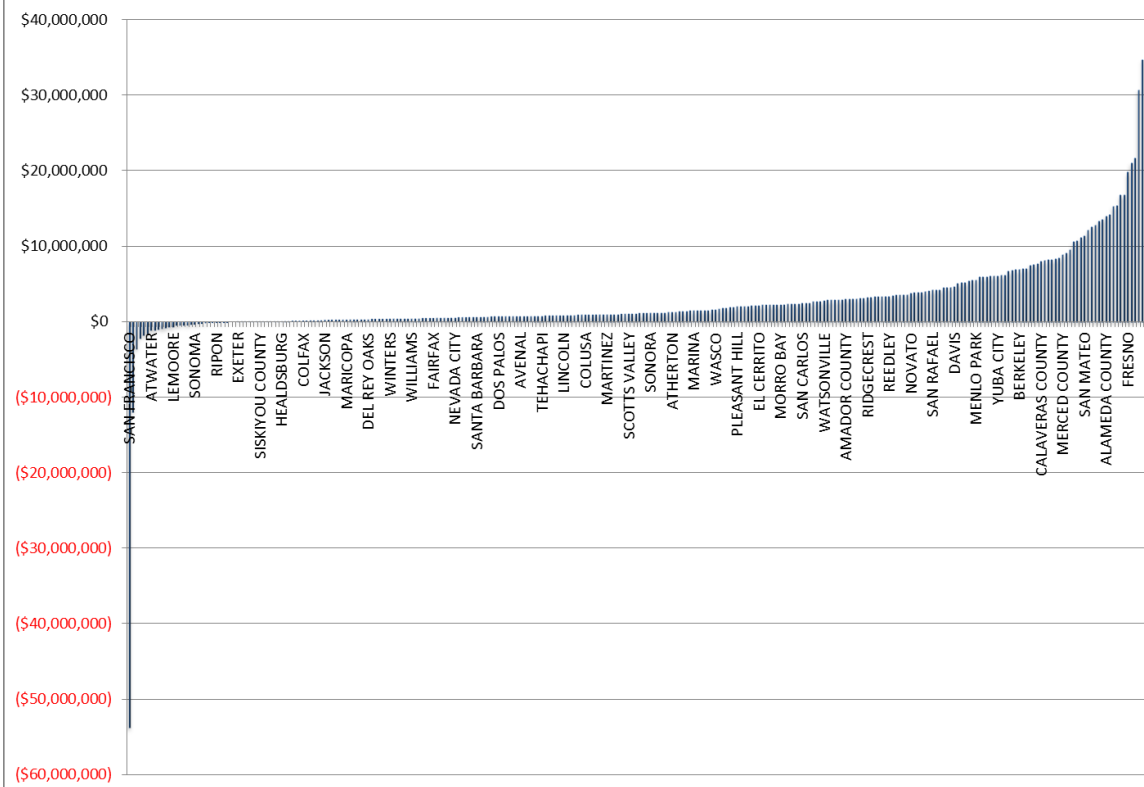


Figure 11 - PG&E 2015 Rule 20A Balances





7.0 Rule 20A Performance Review – Southern California Edison

While SCE allocates credits to 192 jurisdictions within its service territory, the largest annual allocations of these credits, over \$1 million per jurisdiction, go to three entities,

1. Los Angeles County,
2. Long Beach, and
3. San Bernardino County.

Over \$37 million is allocated per year by SCE and the cumulative balances of all accounts are over \$145 million.

Regarding the key performance indicators for SCE Rule 20A program administration, data shows that the number of compliant municipalities is 82 out of 192 jurisdictions or 43 percent have underground plans or underground utility district. For municipalities with negative balances, 59 or 31 percent have negative balances, with a total cumulative amount of over \$43 million. For municipalities with insufficient allocations and balances, SCE has the 43 percent with balances under \$ 1 million and 46 percent with allocations under \$100,000. With regards to reporting, there have been complaints by a municipality about utility responsiveness. In addition, SCE has never notified the CPUC regarding cost overruns or negative balances. Overall SCE scored a total performance score of 41.5.

Table 13 - SCE Rule 20A Program Statistics

Utility	Number of Rule 20A municipalities	Total Annual Allocations 2015	Total Cumulative Balances	Avg. No. of Rule 20A projects per year	Avg. Annual Rule 20A Spend
SCE	192	\$37,154,543	\$145,161,469	10	\$27,255,662

Table 14 - SCE Rule 20A Balanced Score Card

Utility	No. of Compliant Municipalities	No. of Municipalities w Negative Balance	Total Negative Balance	No. of Municipalities w Balance < \$1M	No. of Municipalities w Allocations < \$100,000	Reporting	Overall Score
SCE	82 (43%)	59 (31%)	(\$43,100,206)	83 (43%)	88 (46%)		
Category	Compliance	Fiscal Risk		Available Resources		Reporting	
Score	10.7	17.3		13.5		0	41.5



Figure 12 - SCE 2015 Rule 20A Allocations

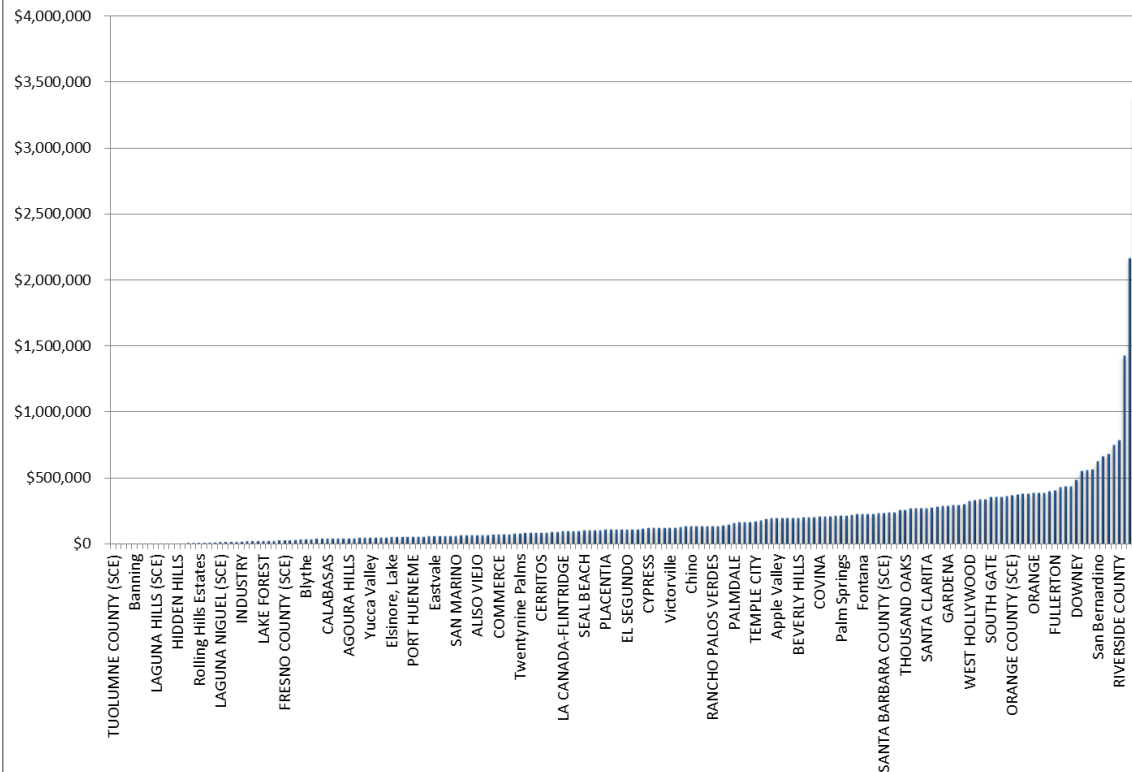
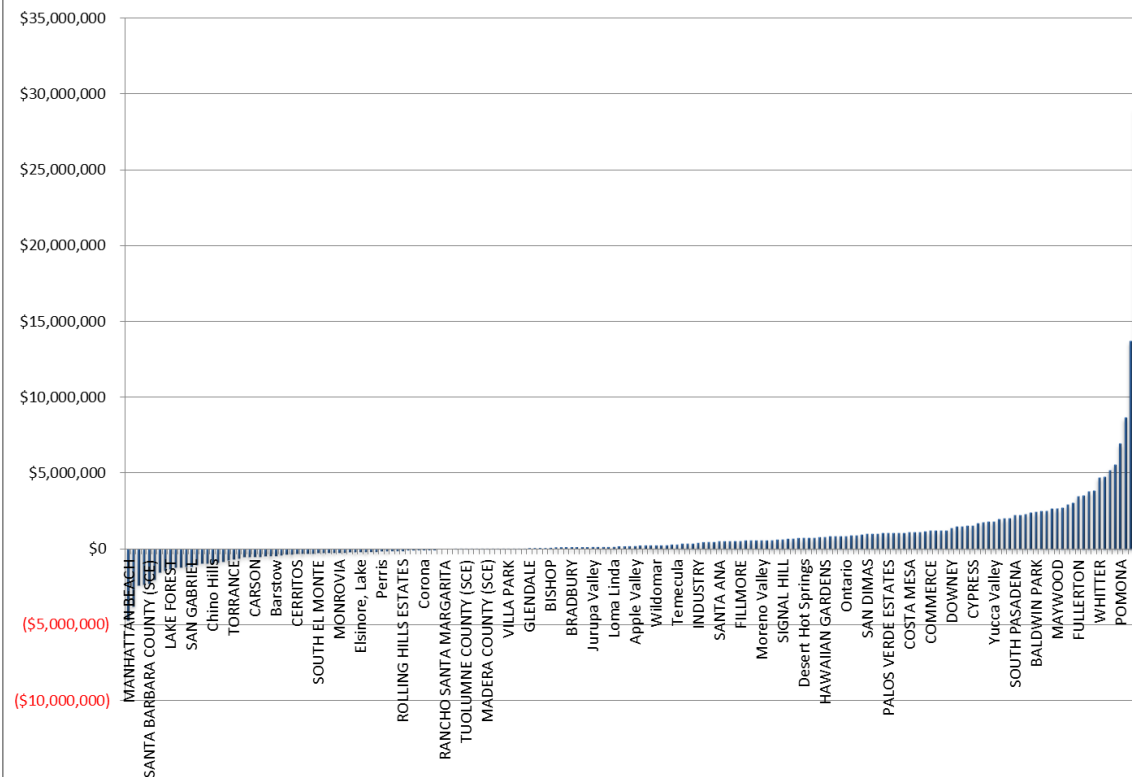


Figure 13 - SCE 2015 Rule 20A Balances





8.0 Rule 20A Performance Review – San Diego Gas & Electric Company

While SDGE allocates credits to 27 jurisdictions within its service territory, the bulk of these credits go to three jurisdictions,

1. Chula Vista,
2. San Diego County and
3. City of San Diego.

Over \$26 million is allocated per year by SDGE and the cumulative balances of all accounts are over \$130 million. The average annual spending by SDGE on conversions projects is over \$23 million.

Regarding the key performance indicators for SDGE, Rule 20A program administration shows that it scores high with the number of compliant municipalities, with 26 out of 27 jurisdictions having underground utility district. That said, it is unclear why these jurisdictions do not have undergrounding plans. For municipalities with negative balances, only 7 have small negative balances, but it still represents 26% of the municipalities in SDGE's program. For municipalities with insufficient allocations and balances, SDGE has the smallest percentage of the three utilities. SDGE also provided all information requested by the CPUC for this program review and there have been no complaints by municipalities about utility responsiveness; so SDGE scores high on this key performance indicator. Overall SDGE scored a total performance score of 84.3.

Table 15 - SDGE Rule 20A Program Statistics

Utility	Number of Rule 20A municipalities	Total Annual Allocations 2015	Total Cumulative Balances	Avg. No. of Rule 20A projects per year	Avg. Annual Rule 20A Spend
SDGE	27	\$26,273,308	\$131,329,491	8	\$23,103,310

Table 16 - SDGE Rule 20A Balanced Score Card

Utility	No. of Compliant Municipalities	No. of Municipalities w Negative Balance	Total Negative Balance	No. of Municipalities w Balance < \$1M	No. of Municipalities w Allocations < \$100,000	Reporting	Overall Score
SDGE	26 (96%)	7 (26%)	(\$2,575,882)	6 (22%)	11 (41%)		
Category	Compliance	Fiscal Risk		Available Resources		Reporting	
Score	24	20.5		14.8		25	84.3



Figure 14- SDGE 2015 Rule 20A Allocation

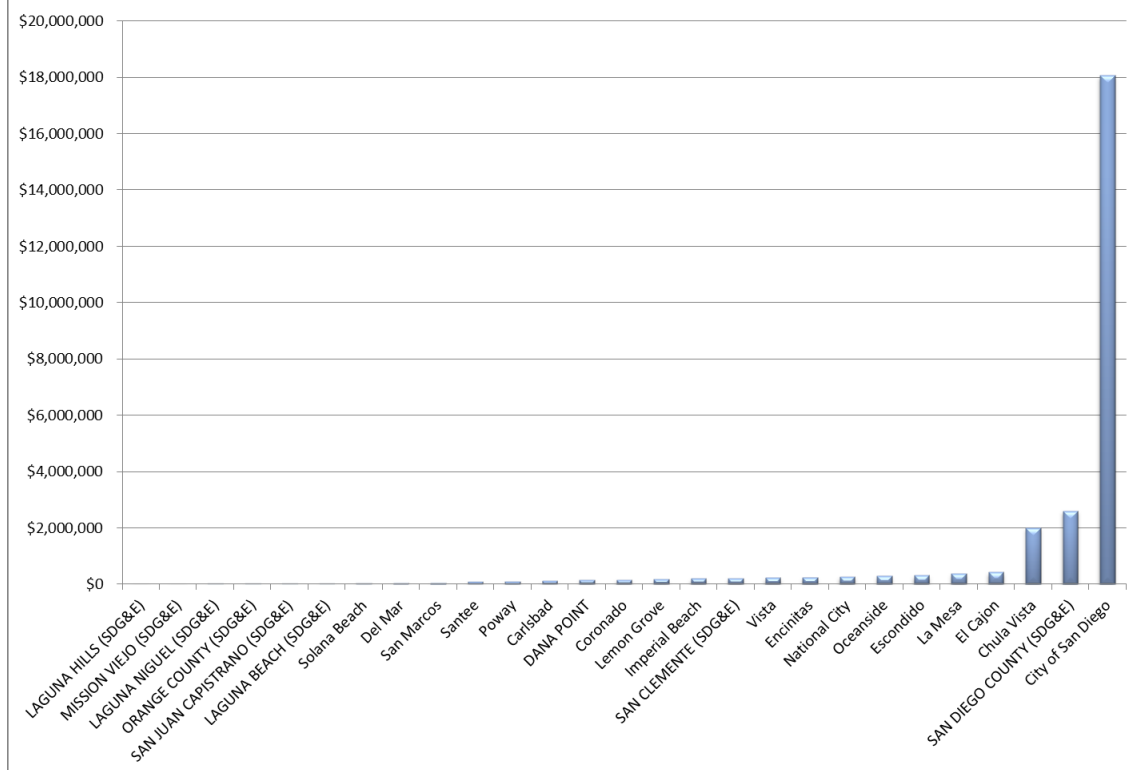


Figure 15 - SDGE Rule 20A 2015 Balances

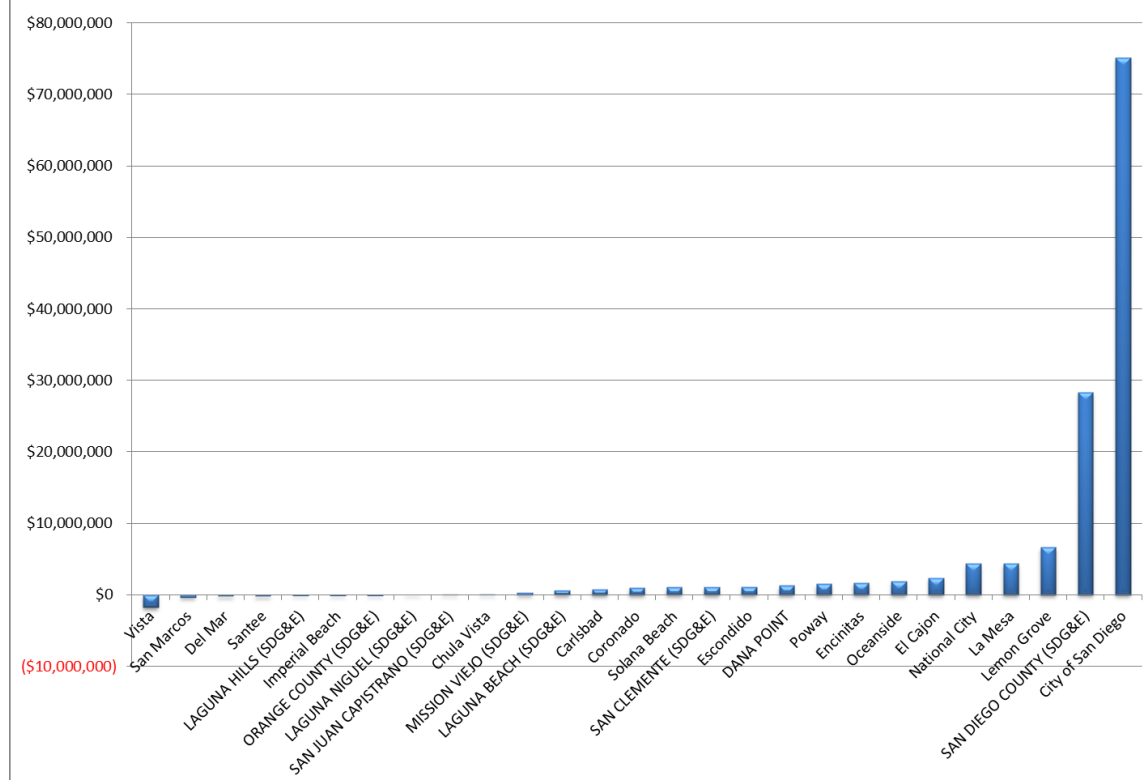




Table 17
Rule 20A Program Balanced Score Card

Utility	Compliant Municipalities	Municipalities with Negative Balance	Municipalities with Low Balance or Allocation < \$1M	Program Reporting	Overall Score
PGE	3.6	22.5	15.6	5	46.7
SCE	10.7	17.3	13.5	0	41.5
SDGE	24	20.5	14.8	25	84.3

9.0 Final Recommendations

This review examines the Rule 20A program administered separately by the three large investor-owned electric utilities for municipalities within their service territories. This review also establishes a Balanced Scorecard performance management tool for monitoring utility program management. Our analysis shows that the Bay Area, Central Valley and Los Angeles County have the highest cumulative balances of Rule 20A credits while the Bay Area, Orange and San Diego Counties, and Los Angeles have the largest distribution of annual allocations.

Overall, this program review provides a measurable means for concluding that program management at two utilities, SCE and PG&E, is insufficient in terms of managing risk and meeting program expectations. Additionally, this review identified significant program flaws that warrant reform and potentially replacement with a less burdensome, more transparent program that better meets the needs of stakeholders, particularly local municipalities and ratepayers.

Based on this review, the Policy and Planning Division and the Energy Division recommend that the CPUC take the following actions:

- ◆ Establish triennial program performance review of this program if it is maintained in its current form.
- ◆ Conduct a financial audit of each utility's administration of Rule 20A program. This audit should determine 1) how utilities determine allocations amounts from year to year for each municipal account, 2) whether municipalities are receiving credits but have no intentions of or need for participating in the program, and 3) why so many projects have cost overruns, 4) how best to resolve current deficits, and prevent future overruns.
- ◆ If the financial audit finds evidence for insufficient program management, CPUC should consider alternatives to the utility serving as the allocation distributor and CPUC's Energy Division should take over the project management for this segment of the program.
- ◆ Request municipalities that intend to conduct conversion projects in the next five to ten years but do not meet program criteria to indicate whether they still have an interest in participating in the program and to specify actions to meet program criteria.
- ◆ For jurisdictions that do not meet program criteria and do not plan to pursue any conversion projects in the next five to ten years, the respective utility should suspend these accounts with no annual allocations to those municipalities until such time when they indicate an interest in conversion projects with supporting documentation and approvals. For those credits that



would have gone to suspended accounts, the utilities should redistribute these credits to the remaining active accounts.

- ◆ Issue an Order Instituting Rulemaking (OIR) to initiate a proceeding to either update Rule 20A to incorporate appropriate program and project management improvements that will improve performance or replace with a program that is administratively less burdensome and more responsive and accountable in its support of municipal conversion projects.
- ◆ Prepare Performance Reviews of the other Rule 20 programs, 20B, 20C and 20D.

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Appendices

Appendix A – Rule 20A Allocations and Balances History by Region

Appendix B – Rule 20A Allocations and Balances by Utility

Appendix C – Rule 20A Municipalities with Negative Balances

Appendix D – Jurisdictions Compliant with Rule 20A Criteria by Utility

Appendix E – PGE 2015 Rule 20A Allocations and Balances

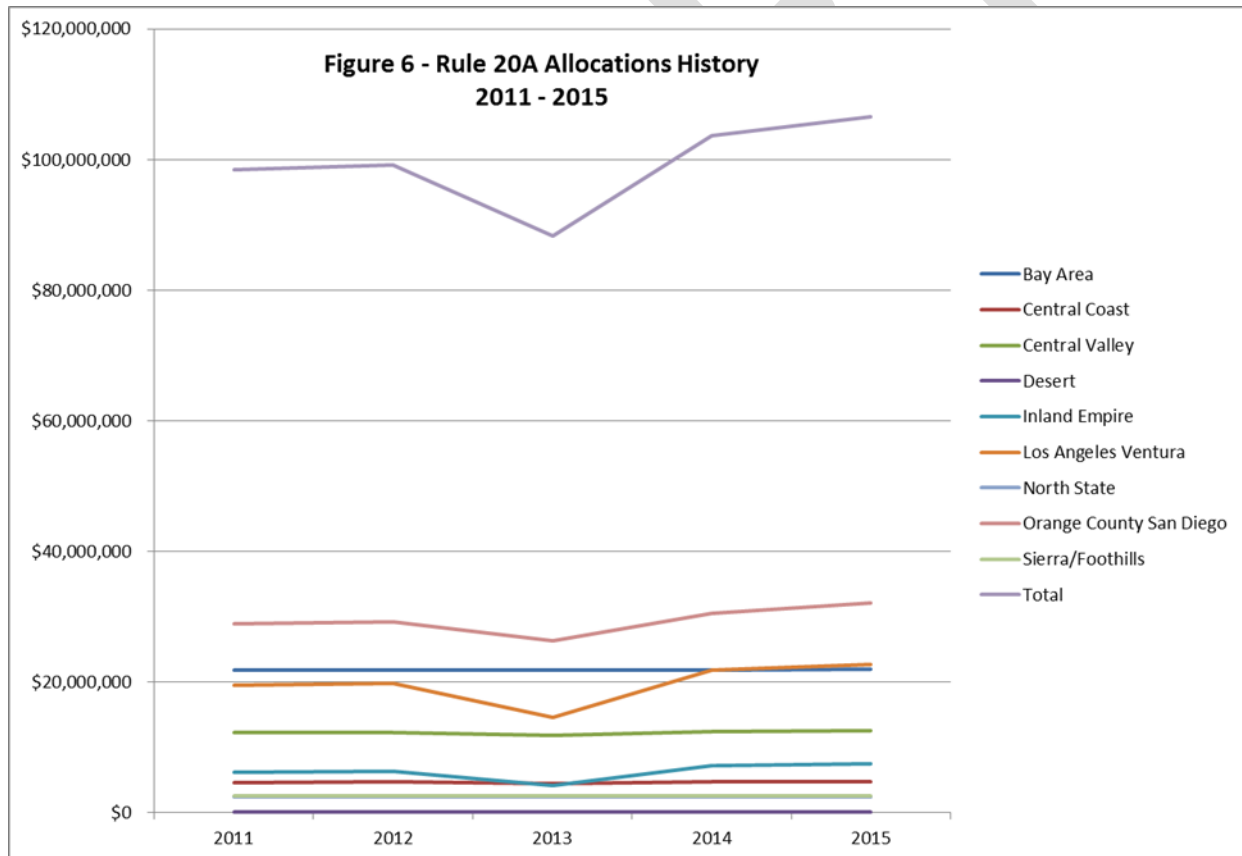
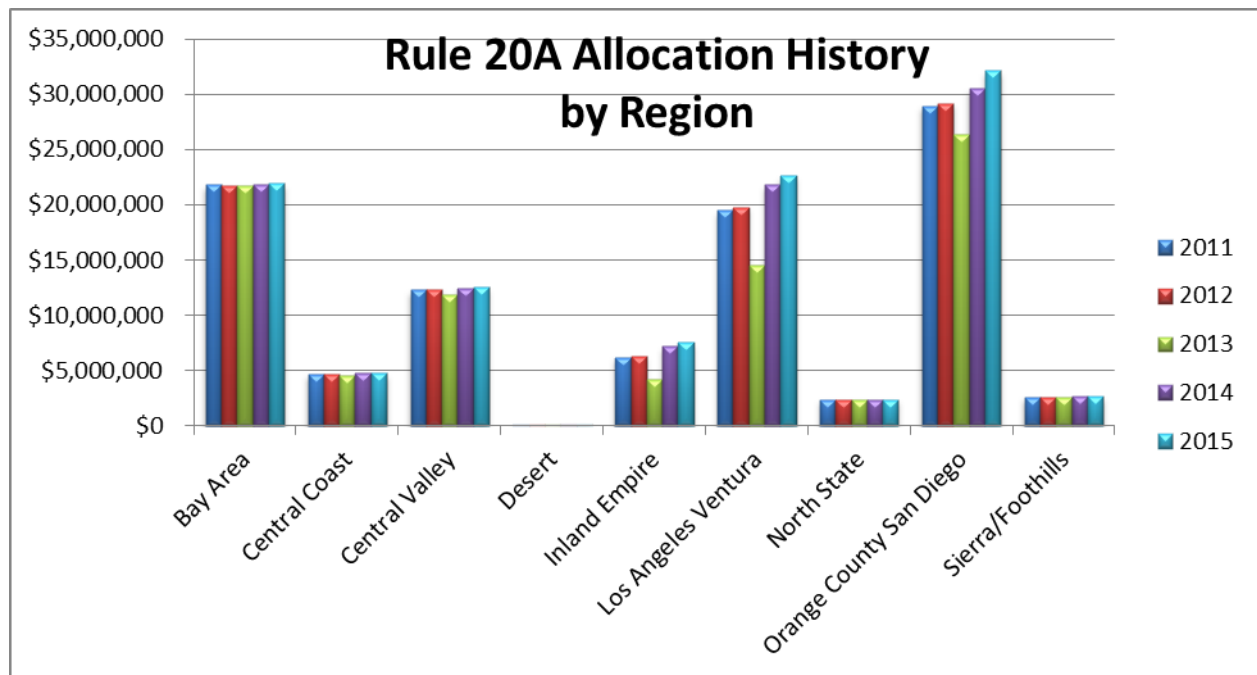
Appendix F – SCE Rule 20A Allocations and Balances

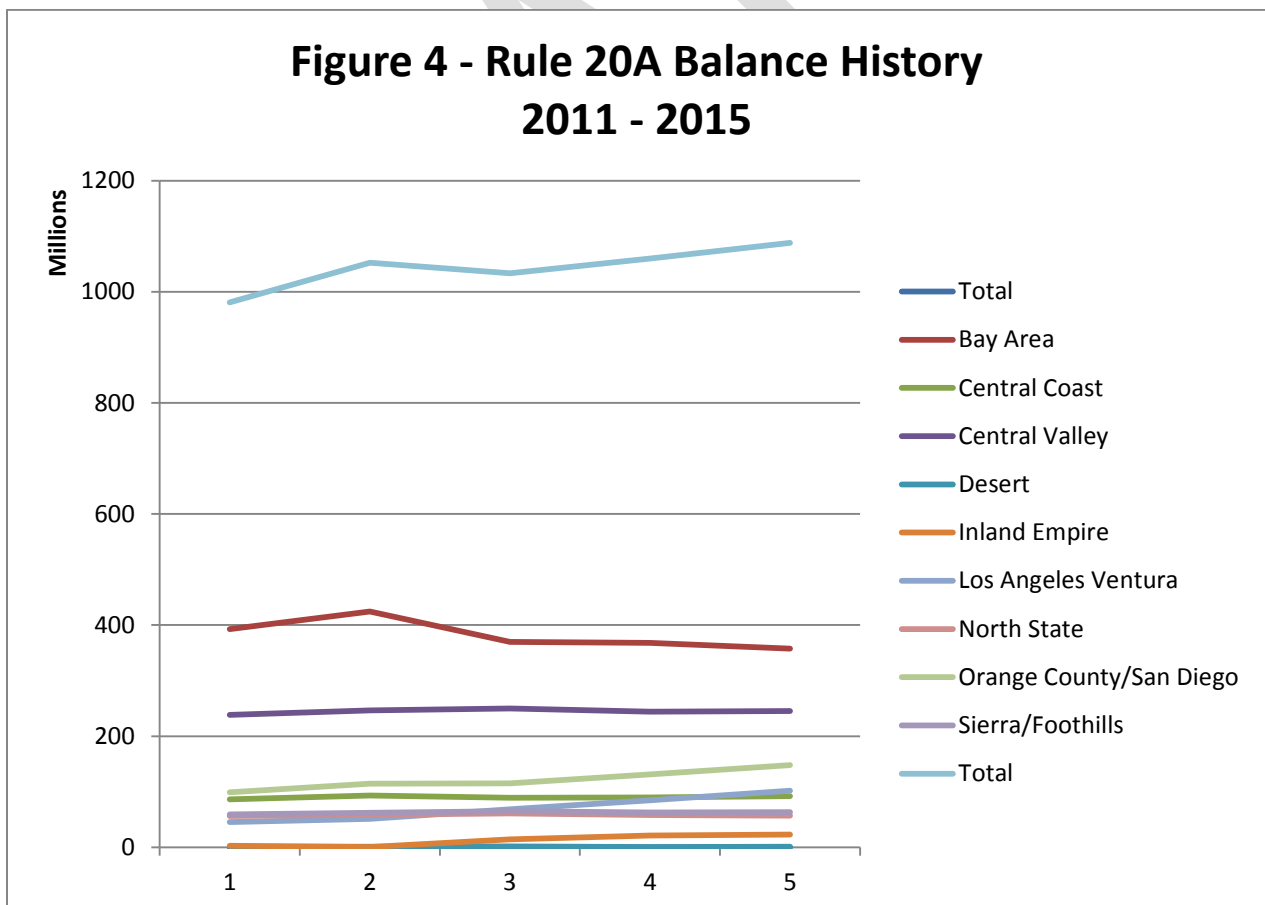
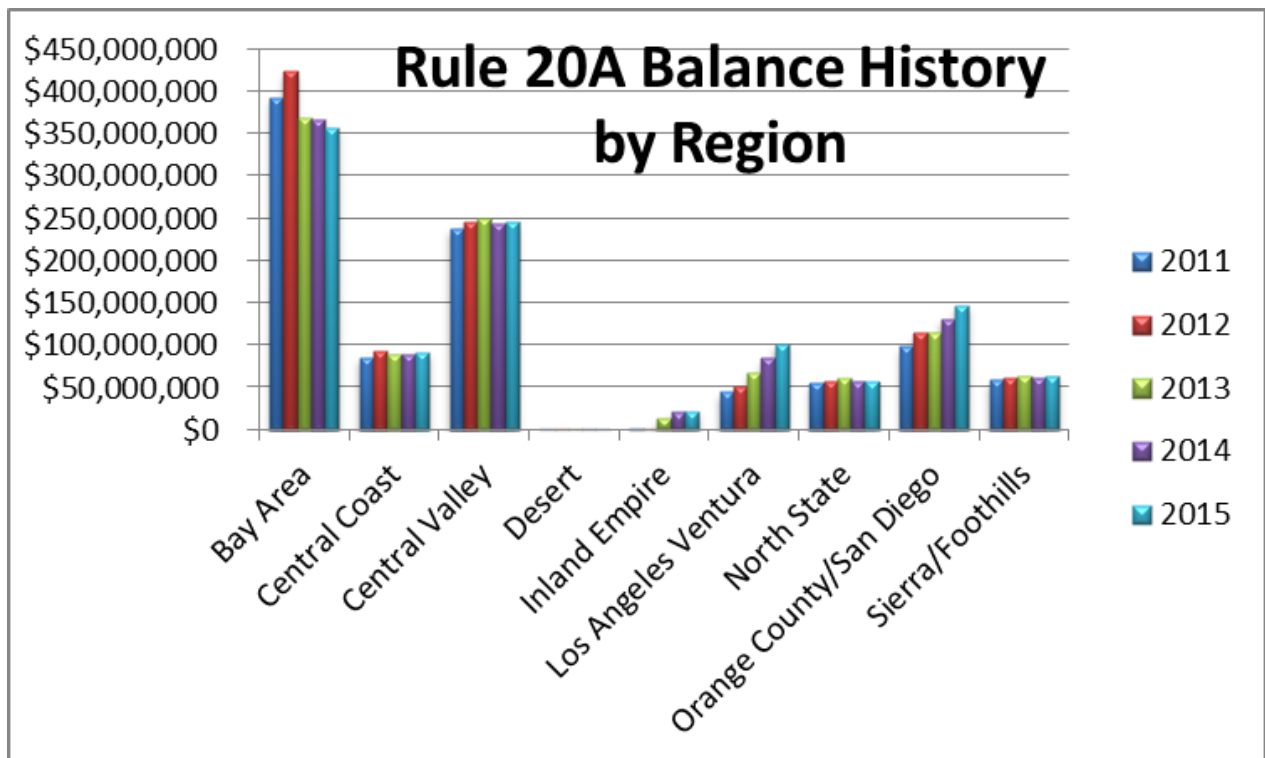
Appendix G – SDGE Rule 20A Allocations and Balances



Appendix A – Rule 20A Allocations and Balances History by Region

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Appendix B – Rule 20A Allocations and Balances by Utility



PGE

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
ALAMEDA	ALAMEDA COUNTY	\$506,109	\$14,007,317	28	Unknown	No	PG&E
ALAMEDA	ALBANY	\$72,008	\$2,894,483	40	Unknown	No	PG&E
ALAMEDA	BERKELEY	\$528,394	\$6,894,245	13	Yes	No	PG&E
ALAMEDA	DUBLIN	\$115,041	\$450,523	4	Unknown	No	PG&E
ALAMEDA	EMERYVILLE	\$41,342	\$771,875	19	Unknown	No	PG&E
ALAMEDA	FREMONT	\$493,411	\$6,050,124	12	Unknown	No	PG&E
ALAMEDA	HAYWARD	\$437,779	(\$837,280)	(2)	Yes	No	PG&E
ALAMEDA	LIVERMORE	\$210,986	\$4,228,593	20	Unknown	No	PG&E
ALAMEDA	NEWARK	\$108,266	\$2,284,554	21	Unknown	No	PG&E
ALAMEDA	OAKLAND	\$1,696,872	\$30,734,860	18	Unknown	No	PG&E
ALAMEDA	PIEDMONT	\$37,026	\$597,144	16	Unknown	No	PG&E
ALAMEDA	PLEASANTON	\$143,609	\$1,532,933	11	Unknown	No	PG&E
ALAMEDA	SAN LEANDRO	\$312,667	\$5,955,173	19	Unknown	No	PG&E
ALAMEDA	UNION CITY	\$111,429	\$3,068,127	28	Unknown	No	PG&E
ALPINE	ALPINE COUNTY	\$2,899	\$9,767	3	Unknown	No	PG&E
AMADOR	AMADOR COUNTY	\$136,094	\$3,023,237	22	Unknown	No	PG&E
AMADOR	AMADOR CITY	\$1,363	\$45,972	34	Unknown	No	PG&E
AMADOR	IONE	\$13,904	\$476,647	34	Unknown	No	PG&E
AMADOR	JACKSON	\$21,320	\$264,894	12	Unknown	No	PG&E
AMADOR	PLYMOUTH	\$4,389	\$210,770	48	Unknown	No	PG&E
AMADOR	SUTTER CREEK	\$14,143	\$557,435	39	Unknown	No	PG&E
BUTTE	BUTTE COUNTY	\$426,109	\$13,331,657	31	Unknown	No	PG&E
BUTTE	BIGGS	\$12,774	\$13,877	1	Unknown	No	PG&E
BUTTE	CHICO	\$288,674	\$2,231,933	8	Unknown	No	PG&E
BUTTE	OROVILLE	\$66,475	\$925,739	14	Unknown	No	PG&E
BUTTE	PARADISE	\$129,632	\$4,212,759	32	Unknown	No	PG&E
COLUSA	COLUSA COUNTY	\$71,963	\$2,931,506	41	Unknown	No	PG&E
COLUSA	COLUSA	\$23,572	\$914,681	39	Unknown	No	PG&E
COLUSA	WILLIAMS	\$13,917	\$457,355	33	Unknown	No	PG&E
CALAVERAS	CALAVERAS COUNTY	\$277,096	\$8,005,556	29	Unknown	No	PG&E
CALAVERAS	ANGELS CAMP	\$16,083	(\$690,660)	(43)	Unknown	No	PG&E
CONTRA COSTA	CONTRA COSTA COUNTY	\$527,963	\$15,371,163	29	Yes	No	PG&E
CONTRA COSTA	ANTIOCH	\$212,247	(\$50,823)	(0)	Unknown	No	PG&E
CONTRA COSTA	BRENTWOOD	\$92,269	\$1,222,370	13	Unknown	No	PG&E
CONTRA COSTA	CLAYTON	\$20,992	\$278,680	13	Unknown	No	PG&E
CONTRA COSTA	CONCORD	\$383,477	\$6,790,504	18	Unknown	No	PG&E
CONTRA COSTA	DANVILLE	\$96,068	\$487,652	5	Unknown	No	PG&E
CONTRA COSTA	EL CERRITO	\$115,352	\$2,159,836	19	Unknown	No	PG&E
CONTRA COSTA	HERCULES	\$35,562	\$967,675	27	Unknown	No	PG&E
CONTRA COSTA	LAFAYETTE	\$103,839	\$435,168	4	Unknown	No	PG&E
CONTRA COSTA	MARTINEZ	\$110,126	\$992,602	9	Unknown	No	PG&E
CONTRA COSTA	MORAGA	\$43,800	\$1,540,913	35	Unknown	Yes	PG&E
CONTRA COSTA	OAKLEY	\$65,855	\$727,736	11	Unknown	No	PG&E
CONTRA COSTA	ORINDA	\$71,778	\$2,159,307	30	Unknown	No	PG&E
CONTRA COSTA	PINOLE	\$56,184	\$1,369,111	24	Unknown	No	PG&E
CONTRA COSTA	PITTSBURG	\$127,157	\$2,393,855	19	Unknown	No	PG&E
CONTRA COSTA	PLEASANT HILL	\$114,487	\$2,008,843	18	Unknown	No	PG&E
CONTRA COSTA	RICHMOND	\$361,628	\$9,490,495	26	Unknown	No	PG&E
CONTRA COSTA	SAN PABLO	\$91,995	\$1,545,789	17	Unknown	No	PG&E
CONTRA COSTA	SAN RAMON	\$126,862	\$1,380,309	11	Unknown	No	PG&E
CONTRA COSTA	WALNUT CREEK	\$222,223	\$3,325,320	15	Unknown	No	PG&E
EL DORADO	EL DORADO COUNTY	\$541,885	\$15,297,831	28	Yes	No	PG&E
EL DORADO	PLACERVILLE	\$46,132	(\$473,985)	(10)	Unknown	No	PG&E
FRESNO	FRESNO COUNTY (PG&E)	\$874,928	\$12,786,245	15	Yes	No	PG&E
FRESNO	CLOVIS	\$203,241	\$760,953	4	Unknown	No	PG&E
FRESNO	COALINGA	\$36,187	\$1,003,318	28	Yes	No	PG&E
FRESNO	FIREBAUGH	\$17,587	(\$1,059,413)	(60)	Unknown	No	PG&E
FRESNO	FOWLER	\$16,400	(\$336,127)	(20)	Unknown	No	PG&E
FRESNO	FRESNO	\$1,307,627	\$19,790,794	15	Yes	No	PG&E
FRESNO	HURON	\$11,565	\$145,904	13	Unknown	No	PG&E
FRESNO	KERMAN	\$27,504	\$461,662	17	Unknown	No	PG&E
FRESNO	KINGSBURG	\$33,343	\$1,127,203	34	Yes	No	PG&E
FRESNO	MENDOTA	\$20,003	\$790,239	40	Unknown	No	PG&E
FRESNO	ORANGE COVE	\$20,888	\$905,819	43	Yes	Yes	PG&E
FRESNO	PARLIER	\$24,471	\$2,218,305	91	Yes	No	PG&E
FRESNO	REEDLEY	\$57,318	\$3,389,837	59	Yes	No	PG&E
FRESNO	SAN JOAQUIN	\$7,808	\$342,284	44	Unknown	No	PG&E
FRESNO	SANGER	\$57,686	\$993,935	17	Unknown	No	PG&E
FRESNO	SELMA	\$57,581	\$1,496,837	26	Unknown	No	PG&E
GLENN	GLENN COUNTY	\$95,155	\$3,108,312	33	Unknown	No	PG&E
GLENN	ORLAND	\$28,240	\$1,031,645	37	Unknown	No	PG&E
GLENN	WILLOWS	\$25,757	\$710,105	28	Unknown	No	PG&E
HUMBOLDT	HUMBOLDT COUNTY	\$342,985	\$1,550,059	5	Yes	No	PG&E
HUMBOLDT	FORTUNA	\$47,726	\$3,586,990	75	Unknown	No	PG&E
HUMBOLDT	ARCATA	\$71,011	\$1,453,363	20	Unknown	No	PG&E
HUMBOLDT	BLUE LAKE	\$6,482	\$342,125	53	Unknown	No	PG&E
HUMBOLDT	EUREKA	\$145,363	\$4,482,670	31	Unknown	No	PG&E
HUMBOLDT	FERNDAL	\$9,036	\$2,874,944	318	Unknown	No	PG&E
HUMBOLDT	RIO DELL	\$14,857	\$397,649	27	Unknown	No	PG&E
HUMBOLDT	TRINIDAD	\$2,006	(\$10,116)	(5)	Unknown	No	PG&E



PGE (cont.)

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
KERN	KERN COUNTY (PG&E)	\$800,758	\$21,034,305	26	Unknown	No	PG&E
KERN	ARVIN	\$33,702	\$693,213	21	Unknown	No	PG&E
KERN	BAKERSFIELD	\$807,748	\$9,089,655	11	Yes	No	PG&E
KERN	CALIFORNIA CITY	\$28,414	\$651,675	23	No	Yes	PG&E
KERN	DELANO	\$73,383	(\$425,766)	(6)	No	Yes	PG&E
KERN	MARICOPA	\$5,683	\$299,875	53	Unknown	No	PG&E
KERN	MCFARLAND (PG&E)	\$16,015	\$3,459,566	216	Yes	Yes	PG&E
KERN	RIDGECREST	\$87,492	\$3,184,350	36	No	No	PG&E
KERN	SHAFTER	\$42,922	\$1,196,449	28	Yes	No	PG&E
KERN	TAFT	\$28,452	\$1,126,595	40	Unknown	No	PG&E
KERN	TEHACHAPI	\$23,540	\$778,711	33	No	No	PG&E
KERN	WASCO	\$47,915	\$1,600,317	33	Unknown	No	PG&E
KINGS	KINGS COUNTY (PG&E)	\$102,544	\$2,058,562	20	Unknown	No	PG&E
KINGS	AVENAL	\$23,410	\$727,444	31	Unknown	No	PG&E
KINGS	CORCORAN	\$39,016	\$0	0	Unknown	No	PG&E
KINGS	HANFORD	\$119,850	\$1,179,978	10	No	No	PG&E
KINGS	LEMOORE	\$60,755	(\$671,713)	(11)	Unknown	No	PG&E
LAKE	LAKE COUNTY	\$288,873	\$7,584,444	26	Unknown	No	PG&E
LAKE	CLEARLAKE	\$86,186	\$2,887,955	34	Unknown	No	PG&E
LAKE	LAKEPORT	\$27,685	\$877,499	32	Unknown	No	PG&E
LASSEN	LASSEN COUNTY	\$9,467	\$382,100	40	Unknown	No	PG&E
MADERA	MADERA COUNTY (PG&E)	\$402,209	\$6,651,125	17	Unknown	No	PG&E
MADERA	MADERA	\$129,714	(\$407,679)	(3)	Unknown	No	PG&E
MADERA	CHOWCHILLA	\$35,006	\$2,246,699	64	Unknown	No	PG&E
MARIN	MARIN COUNTY	\$269,903	\$3,060,473	11	Unknown	No	PG&E
MARIN	LARKSPUR	\$47,574	\$1,285,051	27	Unknown	No	PG&E
MARIN	BELVEDERE	\$6,108	(\$286,529)	(47)	Unknown	No	PG&E
MARIN	CORTE MADERA	\$40,276	\$104,098	3	Unknown	No	PG&E
MARIN	FAIRFAX	\$36,158	\$503,120	14	Unknown	No	PG&E
MARIN	MILL VALLEY	\$62,100	(\$921,323)	(15)	Unknown	No	PG&E
MARIN	NOVATO	\$157,413	\$3,803,635	24	Unknown	No	PG&E
MARIN	ROSS	\$9,837	\$221,228	22	Unknown	No	PG&E
MARIN	SAN ANSELMO	\$60,959	\$556,820	9	Unknown	No	PG&E
MARIN	SAN RAFAEL	\$228,106	\$4,199,655	18	Unknown	No	PG&E
MARIN	SAUSALITO	\$44,625	\$1,743,523	39	Unknown	No	PG&E
MARIN	TIBURON	\$29,654	\$675,225	23	Unknown	No	PG&E
MARIPOSA	MARIPOSA COUNTY	\$120,528	\$2,893,358	24	Unknown	No	PG&E
MENDOCINO	MENDOCINO COUNTY	\$316,463	\$6,878,700	22	Unknown	No	PG&E
MENDOCINO	FORT BRAGG	\$36,697	\$1,106,115	30	Unknown	No	PG&E
MENDOCINO	POINT ARENA	\$2,928	\$132,545	45	Unknown	No	PG&E
MENDOCINO	WILLITS	\$22,813	\$725,682	32	Unknown	No	PG&E
MERCED	MERCED COUNTY	\$299,491	\$8,927,361	30	Yes	Yes	PG&E
MERCED	ATWATER	\$67,675	(\$1,145,734)	(17)	Unknown	No	PG&E
MERCED	DOS PALOS	\$16,987	\$697,404	41	Unknown	No	PG&E
MERCED	GUSTINE	\$19,468	\$299,225	15	Unknown	No	PG&E
MERCED	LIVINGSTON	\$18,805	\$684,758	36	Unknown	No	PG&E
MERCED	LOS BANOS	\$82,240	\$1,204,502	15	Unknown	No	PG&E
MERCED	MERCED	\$185,148	(\$433,096)	(2)	Unknown	No	PG&E
MONTEREY	MONTEREY COUNTY	\$421,497	\$12,605,728	30	Yes	No	PG&E
MONTEREY	CARMEL	\$35,803	\$742,111	21	Unknown	No	PG&E
MONTEREY	DEL REY OAKS	\$7,385	\$352,621	48	Unknown	No	PG&E
MONTEREY	GONZALES	\$15,897	\$435,360	27	Unknown	No	PG&E
MONTEREY	GREENFIELD	\$26,665	\$834,527	31	Unknown	No	PG&E
MONTEREY	KING CITY	\$27,303	#VALUE!		Unknown	No	PG&E
MONTEREY	MARINA	\$57,691	\$1,492,810	26	Yes	No	PG&E
MONTEREY	MONTEREY	\$131,444	\$3,916,434	30	Unknown	No	PG&E
MONTEREY	PACIFIC GROVE	\$84,720	\$1,914,953	23	Unknown	No	PG&E
MONTEREY	SALINAS	\$335,480	\$8,373,337	25	Yes	No	PG&E
MONTEREY	SAND CITY	\$4,157	\$192,674	46	Unknown	No	PG&E
MONTEREY	SEASIDE	\$94,829	\$1,039	0	Unknown	No	PG&E
MONTEREY	SOLEDAD	\$26,509	\$670,477	25	Unknown	No	PG&E
NAPA	NAPA COUNTY	\$155,792	(\$11,947,778)	(77)	Unknown	No	PG&E
NAPA	AMERICAN CANYON	\$30,497	\$388,997	13	Unknown	No	PG&E
NAPA	CALISTOGA	\$19,415	\$709,937	37	Unknown	No	PG&E
NAPA	NAPA	\$243,840	\$8,220,621	34	Unknown	No	PG&E
NAPA	ST HELENA	\$27,853	(\$113,522)	(4)	Unknown	No	PG&E
NAPA	YOUNTVILLE	\$7,279	\$145,079	20	Unknown	No	PG&E
NEVADA	NEVADA COUNTY	\$338,420	\$10,703,993	32	Unknown	No	PG&E
NEVADA	NEVADA CITY	\$18,945	\$568,873	30	Unknown	No	PG&E
NEVADA	GRASS VALLEY	\$54,736	\$528,586	10	Unknown	No	PG&E
PLACER	PLACER COUNTY	\$375,822	\$7,005,452	19	Yes	No	PG&E
PLACER	AUBURN	\$56,272	(\$215,857)	(4)	Unknown	No	PG&E
PLACER	COLFAX	\$9,387	\$170,446	18	Unknown	No	PG&E
PLACER	LINCOLN	\$86,262	\$849,331	10	Unknown	No	PG&E
PLACER	LOOMIS	\$23,862	\$891,650	37	Unknown	No	PG&E
PLACER	ROCKLIN	\$115,957	\$2,080,256	18	Unknown	No	PG&E
PLACER	ROSEVILLE	\$17,029	\$18,363	1	Unknown	No	PG&E
PLUMAS	PLUMAS COUNTY	\$101,065	\$2,396,216	24	Unknown	No	PG&E



PGE (cont.)

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District? (Y/N)	Utility
SACRAMENTO	SACRAMENTO COUNTY	\$19,995	\$985,449	49	Unknown	No	PG&E
SACRAMENTO	ISLETON	\$4,807	\$285,482	59	Unknown	No	PG&E
SAN BENITO	SAN BENITO COUNTY	\$81,510	\$3,295,280	40	Unknown	No	PG&E
SAN BENITO	HOLLISTER	\$68,672	\$391,758	6	Yes	No	PG&E
SAN BENITO	SAN JUAN BAUTISTA	\$7,673	\$344,653	45	Unknown	No	PG&E
SAN FRANCISCO	SAN FRANCISCO	\$3,109,290	(\$53,760,782)	(17)	Unknown	No	PG&E
SAN JOAQUIN	SAN JOAQUIN COUNTY	\$612,481	\$21,651,190	35	Unknown	No	PG&E
SAN JOAQUIN	ESCALON	\$18,329	\$588,681	32	Unknown	No	PG&E
SAN JOAQUIN	LATHROP	\$33,446	\$265,626	8	Unknown	No	PG&E
SAN JOAQUIN	MANTECA	\$151,641	\$3,552,000	23	Unknown	No	PG&E
SAN JOAQUIN	RIPON	\$26,370	(\$63,809)	(2)	Unknown	No	PG&E
SAN JOAQUIN	STOCKTON	\$705,525	\$10,591,172	15	Yes	No	PG&E
SAN JOAQUIN	TRACY	\$156,903	\$2,466,304	16	Unknown	No	PG&E
SAN LUIS OBISPO	SAN LUIS OBISPO COUNTY	\$506,657	\$4,551,627	9	Yes	No	PG&E
SAN LUIS OBISPO	ARROYO GRANDE	\$60,360	\$1,768,127	29	Yes	No	PG&E
SAN LUIS OBISPO	ATASCADERO	\$113,971	\$2,680,768	24	Unknown	No	PG&E
SAN LUIS OBISPO	GROVER BEACH	\$59,141	\$792,404	13	Unknown	No	PG&E
SAN LUIS OBISPO	MORRO BAY	\$66,986	\$2,293,559	34	Unknown	No	PG&E
SAN LUIS OBISPO	PASO ROBLES	\$84,623	\$2,309,872	27	Unknown	No	PG&E
SAN LUIS OBISPO	PISMO BEACH	\$39,897	\$3,290,865	82	Yes	No	PG&E
SAN LUIS OBISPO	SAN LUIS OBISPO	\$177,877	(\$1,589,971)	(9)	Unknown	No	PG&E
SAN MATEO	SAN MATEO COUNTY	\$246,564	\$7,033,999	29	Unknown	No	PG&E
SAN MATEO	ATHERTON	\$25,658	\$1,300,405	51	Unknown	No	PG&E
SAN MATEO	BELMONT	\$105,801	\$5,389,297	51	Unknown	No	PG&E
SAN MATEO	BRISBANE	\$19,312	(\$74,550)	(4)	Unknown	No	PG&E
SAN MATEO	BURLINGAME	\$139,900	\$5,189,297	37	Unknown	No	PG&E
SAN MATEO	COLMA	\$4,346	(\$10,837)	(2)	Unknown	No	PG&E
SAN MATEO	DALY CITY	\$267,470	\$6,074,859	23	Unknown	No	PG&E
SAN MATEO	EAST PALO ALTO	\$67,016	\$2,470,453	37	Unknown	No	PG&E
SAN MATEO	FOSTER CITY	\$0	\$0	#DIV/0!	Unknown	No	PG&E
SAN MATEO	HALF MOON BAY	\$33,733	\$180,867	5	Unknown	No	PG&E
SAN MATEO	HILLSBOROUGH	\$30,130	(\$978,587)	(32)	Unknown	No	PG&E
SAN MATEO	MENLO PARK	\$133,624	\$5,517,152	41	Unknown	No	PG&E
SAN MATEO	MILLBRAE	\$78,776	\$3,025,818	38	Unknown	No	PG&E
SAN MATEO	PACIFICA	\$138,915	\$4,509,391	32	Unknown	No	PG&E
SAN MATEO	PORTOLA VALLEY	\$14,893	\$454,092	30	Unknown	No	PG&E
SAN MATEO	REDWOOD CITY	\$282,577	\$7,496,884	27	Unknown	No	PG&E
SAN MATEO	SAN BRUNO	\$150,412	\$5,515,942	37	Unknown	No	PG&E
SAN MATEO	SAN CARLOS	\$135,233	\$2,447,750	18	Unknown	No	PG&E
SAN MATEO	SAN MATEO	\$377,400	\$11,370,203	30	Unknown	No	PG&E
SAN MATEO	SOUTH SAN FRANCISCO	\$203,736	\$6,173,446	30	Unknown	No	PG&E
SAN MATEO	WOODSIDE	\$22,149	\$831,163	38	Unknown	No	PG&E
SANTA BARBARA	SANTA BARBARA COUNTY (PG&E)	\$221,374	\$5,167,958	23	Yes	No	PG&E
SANTA BARBARA	BUELLTON	\$11,120	\$135,270	12	Unknown	No	PG&E
SANTA BARBARA	CARPINTERIA	\$39,588	\$84,251	2	No	No	PG&E
SANTA BARBARA	GOLETA	\$84,057	\$1,126,434	13	No	No	PG&E
SANTA BARBARA	GUADALUPE	\$15,927	\$343,228	22	Unknown	No	PG&E
SANTA BARBARA	SANTA BARBARA	\$427,676	\$639,060	1	No	Yes	PG&E
SANTA BARBARA	SANTA MARIA	\$208,278	\$5,898,931	28	Yes	No	PG&E
SANTA BARBARA	SOLVANG	\$20,025	\$524,666	26	Yes	No	PG&E
SANTA CLARA	SANTA CLARA COUNTY	\$264,682	\$16,772,955	63	Unknown	No	PG&E
SANTA CLARA	CAMPBELL	\$161,322	(\$3,558,670)	(22)	Unknown	No	PG&E
SANTA CLARA	CUPERTINO	\$169,347	\$4,023,415	24	Unknown	No	PG&E
SANTA CLARA	GILROY	\$105,106	\$2,730,223	26	Unknown	No	PG&E
SANTA CLARA	LOS ALTOS	\$118,704	\$1,833,837	15	Unknown	No	PG&E
SANTA CLARA	LOS ALTOS HILLS	\$27,473	\$140,152	5	Unknown	No	PG&E
SANTA CLARA	LOS GATOS	\$121,932	\$3,377,420	28	Unknown	No	PG&E
SANTA CLARA	MILPITAS	\$138,754	\$3,902,433	28	Unknown	No	PG&E
SANTA CLARA	MONTE SERENO	\$11,692	\$463,203	40	Unknown	No	PG&E
SANTA CLARA	MORGAN HILL	\$77,679	\$2,304,416	30	Unknown	No	PG&E
SANTA CLARA	MOUNTAIN VIEW	\$280,758	\$3,040,879	11	Unknown	No	PG&E
SANTA CLARA	SAN JOSE	\$2,275,014	\$34,746,386	15	Yes	No	PG&E
SANTA CLARA	SARATOGA	\$96,009	\$3,575,159	37	Unknown	No	PG&E
SANTA CLARA	SUNNYVALE	\$442,372	\$14,137,367	32	Yes	No	PG&E
SANTA CRUZ	SANTA CRUZ COUNTY	\$538,275	\$16,848,173	31	Yes	No	PG&E
SANTA CRUZ	CAPITOLA	\$46,982	\$1,910,768	41	Yes	No	PG&E
SANTA CRUZ	SANTA CRUZ	\$207,854	\$3,268,650	16	Yes	Yes	PG&E
SANTA CRUZ	SCOTTS VALLEY	\$33,545	\$1,065,914	32	Unknown	No	PG&E
SANTA CRUZ	WATSONVILLE	\$114,619	\$2,774,915	24	Yes	No	PG&E
SHASTA	SHASTA COUNTY	\$329,464	\$8,065,265	24	Unknown	No	PG&E
SHASTA	ANDERSON	\$40,014	(\$2,176,117)	(54)	Unknown	No	PG&E
SHASTA	SHASTA LAKE	\$512	\$6,043	12	Unknown	No	PG&E
SIERRA	SIERRA COUNTY	\$12,313	\$402,264	33	Unknown	No	PG&E
SISKIYOU	SISKIYOU COUNTY	\$464	\$37,218	80	Unknown	No	PG&E
SOLANO	SOLANO COUNTY	\$114,326	\$3,543,018	31	Unknown	No	PG&E
SOLANO	BENICIA	\$76,683	\$2,110,674	28	Unknown	No	PG&E
SOLANO	DIXON	\$40,812	\$576,462	14	Unknown	No	PG&E
SOLANO	FAIRFIELD	\$219,528	\$5,075,145	23	Unknown	No	PG&E
SOLANO	RIO VISTA	\$29,167	\$611,998	21	Unknown	No	PG&E
SOLANO	SUISUN CITY	\$43,473	\$939,215	22	Unknown	No	PG&E
SOLANO	VACAVILLE	\$186,386	\$4,049,011	22	Unknown	No	PG&E
SOLANO	VALLEJO	\$346,975	\$8,414,120	24	Unknown	No	PG&E



PGE (cont.)

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
SONOMA	SONOMA COUNTY	\$736,876	\$13,560,502	18	Unknown	No	PG&E
SONOMA	CLOVERDALE	\$24,950	\$750,678	30	Unknown	No	PG&E
SONOMA	COTATI	\$20,670	\$532,126	26	Unknown	No	PG&E
SONOMA	HEADSBURG	\$98,554	\$110,533	1	Unknown	No	PG&E
SONOMA	PETALUMA	\$161,271	\$1,039,643	6	Unknown	No	PG&E
SONOMA	ROHNERT PARK	\$78,414	\$2,278,738	29	Unknown	No	PG&E
SONOMA	SEBASTOPOL	\$467,789	\$865,474	2	Unknown	No	PG&E
SONOMA	SANTA ROSA	\$32,248	\$11,101,058	344	Unknown	No	PG&E
SONOMA	SONOMA	\$41,454	(\$305,747)	(7)	Unknown	No	PG&E
SONOMA	WINDSOR	\$44,379	\$474,508	11	Unknown	No	PG&E
STANISLAUS	STANISLAUS COUNTY	\$85,580	\$832,538	10	Unknown	No	PG&E
STANISLAUS	NEWMAN	\$23,048	\$1,080,829	47	Unknown	No	PG&E
STANISLAUS	OAKDALE	\$55,487	\$1,376,979	25	Unknown	No	PG&E
STANISLAUS	RIVERBANK	\$35,173	(\$1,793,524)	(51)	Unknown	No	PG&E
SUTTER	SUTTER COUNTY	\$135,707	\$3,843,684	28	Unknown	No	PG&E
SUTTER	LIVE OAK	\$18,774	\$604,627	32	Unknown	No	PG&E
SUTTER	YUBA CITY	\$170,458	\$6,082,067	36	Unknown	No	PG&E
TEHAMA	TEHAMA COUNTY	\$229,259	\$7,729,907	34	Unknown	No	PG&E
TEHAMA	CORNING	\$29,242	\$295,792	10	Unknown	No	PG&E
TEHAMA	RED BLUFF	\$56,296	\$1,321,564	23	Unknown	No	PG&E
TEHAMA	TEHAMA	\$2,344	\$59,317	25	Unknown	No	PG&E
TRINITY	TRINITY COUNTY	\$19,261	\$988,834	51	Unknown	No	PG&E
TULARE	TULARE COUNTY (SCE)	\$750,777	\$12,116,469	16	No	No	PG&E
TULARE	TULARE COUNTY (PG&E)	\$165,526	\$6,199,752	37	Unknown	No	PG&E
TULARE	DINUBA	\$54,249	\$1,000,754	18	Yes	No	PG&E
TULARE	EXETER	\$31,885	\$917	0	No	No	PG&E
TULARE	FARMERSVILLE	\$18,839	\$699,829	37	No	No	PG&E
TULARE	LINDSAY	\$32,562	\$446,501	14	No	No	PG&E
TULARE	PORTERVILLE	\$98,802	\$726,734	7	No	Yes	PG&E
TULARE	TULARE	\$114,125	\$235,216	2	No	No	PG&E
TULARE	VISALIA	\$255,302	(\$180,105)	(1)	No	Yes	PG&E
TULARE	WOODLAKE	\$19,736	\$89,698	5	No	No	PG&E
TUOLUMNE	TUOLUMNE COUNTY (PG&E)	\$309,838	\$8,175,110	26	Yes	No	PG&E
TUOLUMNE	SONORA	\$30,175	\$1,166,449	39	Unknown	No	PG&E
YOLO	YOLO COUNTY	\$117,503	\$2,669,449	23	Unknown	No	PG&E
YOLO	DAVIS	\$159,183	\$4,643,687	29	Unknown	No	PG&E
YOLO	WEST SACRAMENTO	\$142,356	\$911,335	6	Unknown	No	PG&E
YOLO	WINTERS	\$17,143	\$421,489	25	Unknown	No	PG&E
YOLO	WOODLAND	\$145,074	\$2,045,560	14	Unknown	No	PG&E
YUBA	YUBA COUNTY	\$207,470	\$5,920,742	29	Unknown	No	PG&E
YUBA	MARYSVILLE	\$53,384	\$2,384,183	45	Unknown	No	PG&E
YUBA	WHEATLAND	\$10,295	\$344,849	33	Unknown	No	PG&E
		\$43,506,028	\$748,763,510				282



SCE

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District? (Y/N)	Utility
FRESNO	FRESNO COUNTY (SCE)	\$28,421	\$716,454	25	No	No	SCE
IMPERIAL	IMPERIAL COUNTY	\$5,082	\$171,069	34	No	No	SCE
INYO	INYO COUNTY	\$42,170	\$549,576	13	No	No	SCE
INYO	BISHOP	\$4,193	\$102,435	24	No	No	SCE
KERN	KERN COUNTY (SCE)	\$436,005	\$4,766,739	11	No	No	SCE
KERN	MCFARLAND (SCE)	\$9,815	\$117,567	12	No	No	SCE
KINGS	KINGS COUNTY (SCE)	\$68,298	\$431,067	6	No	No	SCE
LOS ANGELES	LOS ANGELES COUNTY	\$3,395,422	\$28,959,392	9	No	Yes	SCE
LOS ANGELES	AGOURA HILLS	\$42,308	\$1,145,840	27	No	No	SCE
LOS ANGELES	ALHAMBRA	\$428,771	\$5,564,761	13	No	Yes	SCE
LOS ANGELES	ARCADIA	\$269,491	(\$1,179,103)	(4)	No	No	SCE
LOS ANGELES	ARTESIA	\$63,104	\$989,396	16	No	No	SCE
LOS ANGELES	AVALON	\$21,575	\$184,957	9	No	No	SCE
LOS ANGELES	AZUSA	\$7,922	\$70,884	9	No	No	SCE
LOS ANGELES	BALDWIN PARK	\$213,194	\$2,428,471	11	No	No	SCE
LOS ANGELES	BELL	\$132,339	(\$384,875)	(3)	No	Yes	SCE
LOS ANGELES	BELL GARDENS	\$140,608	(\$205,804)	(1)	No	Yes	SCE
LOS ANGELES	BELLFLOWER	\$296,484	\$359,253	1	No	Yes	SCE
LOS ANGELES	BEVERLY HILLS	\$197,493	(\$618,445)	(3)	No	Yes	SCE
LOS ANGELES	BRADBURY	\$4,762	\$123,446	26	No	No	SCE
LOS ANGELES	CALABASAS	\$39,347	\$1,027,792	26	No	No	SCE
LOS ANGELES	CARSON	\$295,548	(\$512,958)	(2)	No	Yes	SCE
LOS ANGELES	CERRITOS	\$86,957	(\$314,733)	(4)	No	Yes	SCE
LOS ANGELES	CLAREMONT	\$115,920	\$520,491	4	No	No	SCE
LOS ANGELES	COMMERCE	\$70,197	\$1,186,944	17	No	No	SCE
LOS ANGELES	COMPTON	\$339,548	\$5,193,976	15	No	No	SCE
LOS ANGELES	COVINA	\$206,049	\$1,800,888	9	No	No	SCE
LOS ANGELES	CUDAHY	\$72,516	\$71,105	1	No	Yes	SCE
LOS ANGELES	CULVER CITY	\$196,659	\$742,100	4	No	Yes	SCE
LOS ANGELES	DIAMOND BAR	\$110,079	\$1,188,451	11	No	No	SCE
LOS ANGELES	DOWNEY	\$485,430	\$1,394,945	3	No	Yes	SCE
LOS ANGELES	DUARTE	\$64,586	(\$176,863)	(3)	No	No	SCE
LOS ANGELES	EL MONTE	\$378,609	\$2,027,213	5	No	No	SCE
LOS ANGELES	EL SEGUNDO	\$110,001	\$822,868	7	No	No	SCE
LOS ANGELES	GARDENA	\$286,061	(\$2,374,206)	(8)	No	Yes	SCE
LOS ANGELES	GLENDALE	\$6,741	\$56,178	8	No	No	SCE
LOS ANGELES	GLENORA	\$194,673	(\$523,721)	(3)	No	Yes	SCE
LOS ANGELES	HAWAIIAN GARDENS	\$41,498	\$791,133	19	No	No	SCE
LOS ANGELES	HAWTHORNE	\$331,516	\$262,098	1	No	No	SCE
LOS ANGELES	HERMOSA BEACH	\$127,816	\$121,513	1	No	No	SCE
LOS ANGELES	HIDDEN HILLS	\$6,330	\$1,062	0	No	No	SCE
LOS ANGELES	HUNTINGTON PARK	\$212,353	\$2,286,482	11	No	Yes	SCE
LOS ANGELES	INDUSTRY	\$19,157	\$403,398	21	No	No	SCE
LOS ANGELES	INGLEWOOD	\$553,308	(\$6,270)	(0)	No	No	SCE
LOS ANGELES	IRVINDALE	\$13,185	(\$142,013)	(11)	No	No	SCE
LOS ANGELES	LA CANADA-FLINTRIDGE	\$96,006	(\$3,756,222)	(39)	No	No	SCE
LOS ANGELES	LA HABRA HEIGHTS	\$23,121	\$143,101	6	No	Yes	SCE
LOS ANGELES	LA MIRADA	\$166,072	\$1,190,089	7	No	No	SCE
LOS ANGELES	LA PUENTE	\$121,696	\$2,710,397	22	No	Yes	SCE
LOS ANGELES	LA VERNE	\$76,504	\$3,812,017	50	No	No	SCE
LOS ANGELES	LAKEWOOD	\$359,401	\$3,535,690	10	No	Yes	SCE
LOS ANGELES	LANCASTER	\$271,654	\$2,902,246	11	No	Yes	SCE
LOS ANGELES	LAWNDALE	\$131,341	(\$908,169)	(7)	No	No	SCE
LOS ANGELES	LOMITA	\$102,262	(\$219,641)	(2)	No	No	SCE
LOS ANGELES	LONG BEACH	\$2,163,521	\$13,707,478	6	No	Yes	SCE
LOS ANGELES	LOS ANGELES, CITY OF	\$7,937	\$65,153	8	No	No	SCE
LOS ANGELES	LYNWOOD	\$223,426	\$2,214,127	10	No	Yes	SCE
LOS ANGELES	MALIBU	\$52,071	(\$529,310)	(10)	No	No	SCE
LOS ANGELES	MANHATTAN BEACH	\$203,912	(\$4,667,280)	(23)	No	No	SCE
LOS ANGELES	MAYWOOD	\$98,967	\$2,661,278	27	No	No	SCE
LOS ANGELES	MONROVIA	\$187,309	(\$229,209)	(1)	No	Yes	SCE
LOS ANGELES	MONTEBELLO	\$253,921	(\$1,205,288)	(5)	No	Yes	SCE
LOS ANGELES	MONTEREY PARK	\$273,514	\$1,010,323	4	No	Yes	SCE
LOS ANGELES	NORWALK	\$354,519	\$828,273	2	No	Yes	SCE
LOS ANGELES	PALMDALE	\$159,396	\$1,496,312	9	No	No	SCE
LOS ANGELES	PALOS VERDE ESTATES	\$44,030	\$1,030,213	23	No	No	SCE
LOS ANGELES	PARAMOUNT	\$163,914	\$833,941	5	No	No	SCE
LOS ANGELES	PASADENA	\$942	\$7,865	8	No	No	SCE
LOS ANGELES	PICO RIVERA	\$218,717	\$284,026	1	No	No	SCE
LOS ANGELES	POMONA	\$438,190	\$6,936,151	16	No	Yes	SCE
LOS ANGELES	RANCHO PALOS VERDES	\$132,714	\$1,234,917	9	No	No	SCE
LOS ANGELES	REDONDO BEACH	\$388,445	(\$1,395,619)	(4)	No	Yes	SCE
LOS ANGELES	Rolling Hills Estates	\$8,595	\$44,327	5	No	No	SCE
LOS ANGELES	ROLLING HILLS ESTATES	\$28,465	(\$115,004)	(4)	No	Yes	SCE
LOS ANGELES	ROSEMEAD	\$196,293	(\$726,378)	(4)	No	Yes	SCE
LOS ANGELES	SAN DIMAS	\$84,210	\$973,787	12	No	No	SCE
LOS ANGELES	SAN FERNANCO	\$92,438	\$109,410	1	No	No	SCE
LOS ANGELES	SAN GABRIEL	\$196,419	(\$1,148,547)	(6)	No	Yes	SCE
LOS ANGELES	SAN MARINO	\$62,026	(\$255,586)	(4)	No	No	SCE
LOS ANGELES	SANTA CLARITA	\$272,151	(\$496,850)	(2)	No	No	SCE
LOS ANGELES	SANTA FE SPRINGS	\$86,704	\$1,065,985	12	No	No	SCE
LOS ANGELES	SANTA MONICA	\$663,475	(\$1,990,287)	(3)	No	Yes	SCE
LOS ANGELES	SIERRA MADRE	\$69,547	\$1,040,236	15	No	No	SCE
LOS ANGELES	SIGNAL HILL	\$53,051	\$633,961	12	No	No	SCE
LOS ANGELES	SOUTH EL MONTE	\$100,572	(\$258,280)	(3)	No	Yes	SCE
LOS ANGELES	SOUTH GATE	\$352,871	\$3,760,068	11	No	Yes	SCE
LOS ANGELES	SOUTH PASADENA	\$144,843	\$2,207,257	15	No	Yes	SCE
LOS ANGELES	TEMPLE CITY	\$169,556	(\$1,025,968)	(6)	No	No	SCE
LOS ANGELES	TORRANCE	\$684,311	(\$654,690)	(1)	No	Yes	SCE
LOS ANGELES	WALNUT CREEK	\$54,810	\$656,101	12	No	No	SCE
LOS ANGELES	WEST COVINA	\$297,797	\$220,508	1	No	No	SCE
LOS ANGELES	WEST HOLLYWOOD	\$325,190	(\$120,677)	(0)	No	Yes	SCE
LOS ANGELES	WESTLAKE VILLAGE	\$17,271	\$152,632	9	No	Yes	SCE
LOS ANGELES	WHITTIER	\$397,553	\$4,718,457	12	No	Yes	SCE



SCE (cont.)

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District? (Y/N)	Utility
MADERA	MADERA COUNTY (SCE)	\$190	\$6,740	35	No	No	SCE
MONO	MONO COUNTY	\$34,531	\$146,171	4	No	No	SCE
MONO	MAMMOTH LAKES	\$49,488	(\$232,696)	(5)	No	Yes	SCE
ORANGE	ORANGE COUNTY (SCE)	\$369,243	(\$207,608)	(1)	No	Yes	SCE
ORANGE	ALISO VIEJO	\$67,923	\$0	0	No	No	SCE
ORANGE	ANAHEIM	\$301	\$2,250	7	No	No	SCE
ORANGE	BREA	\$102,841	(\$175,275)	(2)	No	Yes	SCE
ORANGE	BUENA PARK	\$280,692	\$1,518,755	5	No	Yes	SCE
ORANGE	COSTA MESA	\$388,542	\$1,079,596	3	No	No	SCE
ORANGE	CYPRESS	\$118,458	\$1,534,657	13	No	No	SCE
ORANGE	FOUNTAIN VALLEY	\$131,706	\$613,400	5	No	Yes	SCE
ORANGE	FULLERTON	\$406,140	\$3,486,722	9	No	Yes	SCE
ORANGE	GARDEN GROVE	\$565,465	\$2,632,119	5	No	Yes	SCE
ORANGE	HUNTINGTON BEACH	\$558,851	(\$1,169,709)	(2)	No	Yes	SCE
ORANGE	IRVINE	\$235,697	\$1,474,182	6	No	No	SCE
ORANGE	LA HABRA	\$200,191	\$349,397	2	No	No	SCE
ORANGE	LA PALMA	\$26,178	\$43,312	2	No	No	SCE
ORANGE	LAGUNA BEACH (SCE)	\$108,028	\$2,004,256	19	No	Yes	SCE
ORANGE	LAGUNA HILLS (SCE)	\$2,691	\$126,545	47	No	No	SCE
ORANGE	LAGUNA NIGUEL (SCE)	\$14,638	\$43,447	3	No	No	SCE
ORANGE	LAGUNA WOODS	\$37,153	\$511,568	14	No	No	SCE
ORANGE	LAKE FOREST	\$23,318	(\$1,300,358)	(56)	No	No	SCE
ORANGE	LOS ALAMITOS	\$55,964	(\$45,879)	(1)	No	No	SCE
ORANGE	MISSION VIEJO (SCE)	\$99,143	(\$0)	(0)	No	No	SCE
ORANGE	NEWPORT BEACH	\$285,393	(\$2,319,686)	(8)	No	Yes	SCE
ORANGE	ORANGE	\$387,285	(\$805,617)	(2)	No	Yes	SCE
ORANGE	PLACENTIA	\$106,026	\$467,403	4	No	No	SCE
ORANGE	RANCHO SANTA MARGARITA	\$71,543	(\$0)	(0)	No	No	SCE
ORANGE	SANTA ANA	\$747,429	\$509,834	1	No	No	SCE
ORANGE	SEAL BEACH	\$100,342	\$556,639	6	No	Yes	SCE
ORANGE	STANTON	\$91,603	(\$187,357)	(2)	No	Yes	SCE
ORANGE	TUSTIN	\$165,872	\$897,794	5	No	No	SCE
ORANGE	VILLA PARK	\$13,081	\$26,730	2	No	Yes	SCE
ORANGE	WESTMINSTER	\$236,007	\$1,971,160	8	No	Yes	SCE
ORANGE	YORBA LINDA	\$111,303	\$689,653	6	No	No	SCE
RIVERSIDE	RIVERSIDE COUNTY	\$789,014	\$8,647,589	11	No	Yes	SCE
RIVERSIDE	Beaumont	\$45,447	\$14,413	0	No	No	SCE
RIVERSIDE	Blythe	\$36,701	\$580,682	16	No	No	SCE
RIVERSIDE	Calimesa	\$22,242	\$176,665	8	No	No	SCE
RIVERSIDE	Canyon Lake	\$15,031	(\$64,411)	(4)	No	Yes	SCE
RIVERSIDE	Cathedral City	\$123,853	\$225,438	2	No	No	SCE
RIVERSIDE	Corona	\$207,351	(\$49,206)	(0)	No	No	SCE
RIVERSIDE	Desert Hot Springs	\$66,286	\$724,850	11	No	Yes	SCE
RIVERSIDE	Eastvale	\$58,635	\$238,702	4	No	No	SCE
RIVERSIDE	Hemet	\$120,525	\$526,246	4	No	Yes	SCE
RIVERSIDE	Indian Wells	\$16,129	\$246,653	15	No	Yes	SCE
RIVERSIDE	Jurupa Valley	\$47,404	\$137,594	3	No	No	SCE
RIVERSIDE	Elsinore, Lake	\$51,145	(\$196,775)	(4)	No	Yes	SCE
RIVERSIDE	Menifee	\$96,820	\$565,301	6	No	No	SCE
RIVERSIDE	Moreno Valley	\$224,279	\$565,164	3	No	Yes	SCE
RIVERSIDE	Murrieta	\$58,836	(\$116,722)	(2)	No	Yes	SCE
RIVERSIDE	Norco	\$61,687	\$926,342	15	No	No	SCE
RIVERSIDE	Palm Desert	\$135,917	\$555,680	4	No	No	SCE
RIVERSIDE	Palm Springs	\$212,770	(\$1,522,745)	(7)	No	Yes	SCE
RIVERSIDE	Perris	\$59,555	(\$145,710)	(2)	No	No	SCE
RIVERSIDE	Rancho Mirage	\$56,827	(\$291,233)	(5)	No	No	SCE
RIVERSIDE	Riverside, City of	\$987	\$6,334	6	No	No	SCE
RIVERSIDE	San Jacinto	\$45,366	\$128,106	3	No	Yes	SCE
RIVERSIDE	Temecula	\$68,536	\$284,067	4	No	Yes	SCE
RIVERSIDE	Wildomar	\$40,884	\$240,192	6	No	No	SCE
SAN BERNARDINO COUNTY	SAN BERNARDINO COUNTY	\$1,425,056	\$2,398,122	2	No	Yes	SCE
SAN BERNARDINO COUNTY	Adelanto	\$24,250	(\$70,041)	(3)	No	Yes	SCE
SAN BERNARDINO COUNTY	Apple Valley	\$194,735	\$204,569	1	No	Yes	SCE
SAN BERNARDINO COUNTY	Banning	\$496	\$4,081	8	No	No	SCE
SAN BERNARDINO COUNTY	Barstow	\$85,843	(\$443,944)	(5)	No	Yes	SCE
SAN BERNARDINO COUNTY	Chino	\$131,665	\$741,640	6	No	Yes	SCE
SAN BERNARDINO COUNTY	Chino Hills	\$38,713	(\$914,250)	(24)	No	No	SCE
SAN BERNARDINO COUNTY	Colton	\$2,124	\$16,427	8	No	No	SCE
SAN BERNARDINO COUNTY	Fontana	\$223,921	\$2,501,690	11	No	Yes	SCE
SAN BERNARDINO COUNTY	Grand Terrace	\$25,342	\$881,050	35	No	No	SCE
SAN BERNARDINO COUNTY	Hesperia	\$226,623	\$1,114,321	5	No	Yes	SCE
SAN BERNARDINO COUNTY	Highland	\$109,419	(\$352,180)	(3)	No	No	SCE
SAN BERNARDINO COUNTY	Loma Linda	\$53,274	\$161,029	3	No	No	SCE
SAN BERNARDINO COUNTY	Montclair	\$107,349	(\$457,403)	(4)	No	Yes	SCE
SAN BERNARDINO COUNTY	Ontario	\$378,168	\$845,522	2	No	Yes	SCE
SAN BERNARDINO COUNTY	Rancho Cucamonga	\$232,070	(\$950,510)	(4)	No	Yes	SCE
SAN BERNARDINO COUNTY	Redlands	\$199,931	\$1,762,739	9	No	Yes	SCE
SAN BERNARDINO COUNTY	Rialto	\$179,148	(\$946,811)	(5)	No	Yes	SCE
SAN BERNARDINO COUNTY	San Bernardino	\$625,875	\$1,060,385	2	No	No	SCE
SAN BERNARDINO COUNTY	Twentynine Palms	\$79,945	(\$249,704)	(3)	No	Yes	SCE
SAN BERNARDINO COUNTY	Upland	\$209,535	\$2,469,981	12	No	No	SCE
SAN BERNARDINO COUNTY	Victorville	\$122,298	\$358,102	3	No	Yes	SCE
SAN BERNARDINO COUNTY	Yucaipa	\$121,770	(\$475,568)	(4)	No	No	SCE
SAN BERNARDINO COUNTY	Yucca Valley	\$46,150	\$1,812,135	39	No	No	SCE



SCE (cont.)

County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District? (Y/N)	Utility
SAN DIEGO	SAN DIEGO COUNTY (SCE)	\$149	\$1,227	8	No	Yes	SCE
SANTA BARBARA	SANTA BARBARA COUNTY (SCE)	\$233,693	(\$2,266,113)	(10)	No	Yes	SCE
TUOLUMNE	TUOLUMNE COUNTY (SCE)	\$56	\$1,548	28	No	No	SCE
VENTURA	VENTURA COUNTY	\$372,648	\$1,676,528	4	No	No	SCE
VENTURA	CAMARILLO	\$131,855	(\$355,834)	(3)	No	Yes	SCE
VENTURA	FILLMORE	\$31,990	\$536,704	17	No	No	SCE
VENTURA	MOORPARK	\$50,181	\$462,988	9	No	No	SCE
VENTURA	OJAI	\$39,013	(\$286,714)	(7)	No	No	SCE
VENTURA	OXNARD	\$354,243	\$3,018,177	9	No	Yes	SCE
VENTURA	PORT HUENEME	\$54,654	(\$295,051)	(5)	No	Yes	SCE
VENTURA	SANTA PAULA	\$87,373	\$761,500	9	No	No response	SCE
VENTURA	SIMI VALLEY	\$266,663	\$133,682	1	No	No	SCE
VENTURA	THOUSAND OAKS	\$254,424	\$1,088,907	4	No	No	SCE
VENTURA	VENTURA	\$335,227	(\$63,101)	(0)	No	No	SCE
		\$37,154,543	\$145,161,469				192

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County	Jurisdiction	2015 Allocation (3/2015)	2015 Balance (12-31-15)	Balance/Allocation	5-Year Plan? (Y/N)	Utility Underground District? (Y/N)	Utility
SAN DIEGO	SAN DIEGO COUNTY (SDG&E)	\$2,608,800	\$28,349,599	11	No	No	SDG&E
SAN DIEGO	Carlsbad	\$120,000	\$816,144	7	No	Yes	SDG&E
SAN DIEGO	Chula Vista	\$2,000,000	\$135,221	0	No	Yes	SDG&E
SAN DIEGO	Coronado	\$159,600	\$1,032,862	6	No	Yes	SDG&E
SAN DIEGO	Del Mar	\$46,800	(\$186,626)	(4)	No	Yes	SDG&E
SAN DIEGO	El Cajon	\$432,000	\$2,371,464	5	No	Yes	SDG&E
SAN DIEGO	Encinitas	\$249,600	\$1,681,017	7	No	Yes	SDG&E
SAN DIEGO	Escondido	\$321,600	\$1,101,543	3	No	Yes	SDG&E
SAN DIEGO	Imperial Beach	\$199,200	(\$30,910)	(0)	No	Yes	SDG&E
SAN DIEGO	La Mesa	\$381,600	\$4,368,936	11	No	Yes	SDG&E
SAN DIEGO	Lemon Grove	\$181,200	\$6,645,818	37	No	Yes	SDG&E
SAN DIEGO	National City	\$270,000	\$4,352,854	16	No	Yes	SDG&E
SAN DIEGO	Oceanside	\$307,200	\$1,901,844	6	No	Yes	SDG&E
SAN DIEGO	Poway	\$98,400	\$1,560,740	16	No	Yes	SDG&E
SAN DIEGO	City of San Diego	\$18,069,308	\$75,090,863	4	No	Yes	SDG&E
SAN DIEGO	San Marcos	\$52,800	(\$362,131)	(7)	Yes	Yes	SDG&E
SAN DIEGO	Santee	\$90,000	(\$176,034)	(2)	Yes	Yes	SDG&E
SAN DIEGO	Solana Beach	\$39,600	\$1,070,227	27	No	Yes	SDG&E
SAN DIEGO	Vista	\$229,200	(\$1,773,400)	(8)	Yes	Yes	SDG&E
		\$26,273,308	\$131,329,491				27



Appendix C
Rule 20A Municipalities with Negative Balances

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County	Jurisdiction	Balance (12-31-15)	Allocation (2016)	Balance (1-1-16)
SAN FRANCISCO	SAN FRANCISCO	(\$53,760,782)	\$3,089,938	(\$50,670,844)
NAPA	NAPA COUNTY	(\$11,947,778)	\$154,128	(\$11,793,650)
LOS ANGELES	MANHATTAN BEACH	(\$4,667,280)	\$206,395	(\$4,507,084)
LOS ANGELES	LA CANADA-FLINTRIDGE	(\$3,756,222)	\$97,322	(\$3,683,009)
SANTA CLARA	CAMPBELL	(\$3,558,670)	\$160,993	(\$3,397,677)
LOS ANGELES	GARDENA	(\$2,374,206)	\$290,492	(\$2,164,058)
SHASTA	ANDERSON	(\$2,176,117)	\$39,410	(\$2,136,707)
ORANGE	NEWPORT BEACH	(\$2,319,686)	\$289,521	(\$2,107,423)
SANTA BARBARA	SANTA BARBARA COUNTY (SCE)	(\$2,266,113)	\$237,227	(\$2,092,362)
STANISLAUS	RIVERBANK	(\$1,793,524)	\$34,816	(\$1,758,708)
SAN DIEGO	VISTA	(\$1,773,400)	\$229,200	(\$1,544,200)
LOS ANGELES	SANTA MONICA	(\$1,990,287)	\$672,401	(\$1,478,748)
SAN LUIS OBISPO	SAN LUIS OBISPO	(\$1,589,971)	\$176,639	(\$1,413,332)
RIVERSIDE	PALM SPRINGS	(\$1,522,745)	\$215,971	(\$1,365,081)
ORANGE	LAKE FOREST	(\$1,300,358)	\$25,516	(\$1,300,358)
LOS ANGELES	REDONDO BEACH	(\$1,395,619)	\$393,904	(\$1,101,887)
MERCED	ATWATER	(\$1,145,734)	\$66,955	(\$1,078,779)
FRESNO	FIREBAUGH	(\$1,059,413)	\$17,516	(\$1,041,897)
LOS ANGELES	MONTEBELLO	(\$1,205,288)	\$257,731	(\$1,017,173)
LOS ANGELES	SAN GABRIEL	(\$1,148,547)	\$199,089	(\$998,462)
LOS ANGELES	ARCADIA	(\$1,179,103)	\$273,121	(\$973,237)
SAN MATEO	HILLSBOROUGH	(\$978,587)	\$29,807	(\$948,780)
SAN BERNARDINO COUNTY	CHINO HILLS	(\$914,250)	\$40,600	(\$908,479)
LOS ANGELES	TEMPLE CITY	(\$1,025,968)	\$171,818	(\$895,958)
MARIN	MILL VALLEY	(\$921,323)	\$61,601	(\$859,722)
SAN BERNARDINO COUNTY	RIALTO	(\$946,811)	\$182,307	(\$822,163)
LOS ANGELES	LAWNDALE	(\$908,169)	\$133,121	(\$807,473)
SAN BERNARDINO COUNTY	RANCHO CUCAMONGA	(\$950,510)	\$237,028	(\$804,057)
ORANGE	HUNTINGTON BEACH	(\$1,169,709)	\$567,610	(\$761,708)
CALAVERAS	ANGELS CAMP	(\$690,660)	\$16,271	(\$674,389)
KINGS	LEMOORE	(\$671,713)	\$60,334	(\$611,379)
LOS ANGELES	ROSEMEAD	(\$726,378)	\$199,103	(\$578,447)
ORANGE	ORANGE	(\$805,617)	\$393,923	(\$533,497)
LOS ANGELES	MALIBU	(\$529,310)	\$52,913	(\$492,069)
LOS ANGELES	BEVERLY HILLS	(\$618,445)	\$200,294	(\$469,437)
EL DORADO	PLACERVILLE	(\$473,985)	\$45,663	(\$428,322)
ALAMEDA	HAYWARD	(\$837,280)	\$434,681	(\$402,599)
SAN BERNARDINO COUNTY	YUCAIPA	(\$475,568)	\$124,077	(\$393,532)
SAN BERNARDINO COUNTY	BARSTOW	(\$443,944)	\$87,332	(\$383,918)
LOS ANGELES	GLENORA	(\$523,721)	\$197,648	(\$380,540)
SAN BERNARDINO COUNTY	MONTCLAIR	(\$457,403)	\$109,193	(\$379,467)
KERN	DELANO	(\$425,766)	\$74,822	(\$377,236)
LOS ANGELES	SANTA CLARITA	(\$496,850)	\$278,413	(\$332,124)
FRESNO	FOWLER	(\$336,127)	\$16,337	(\$319,790)
SAN DIEGO	SAN MARCOS	(\$362,131)	\$52,800	(\$309,331)
LOS ANGELES	CARSON	(\$512,958)	\$300,166	(\$297,641)
LOS ANGELES	BELL	(\$384,875)	\$134,181	(\$284,201)
MARIN	BELVEDERE	(\$286,529)	\$6,035	(\$280,494)
MADERA	MADERA	(\$407,679)	\$129,118	(\$278,561)



Appendix D

Jurisdictions Meeting Rule 20A Criteria by Utility



PGE Jurisdictions

County	Jurisdiction	Balance (12-31-15)	Allocation (2016)	Balance (1-1-16)	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
ALAMEDA	BERKELEY	\$6,894,245	\$523,888	\$7,418,133	Yes	No	PG&E
ALAMEDA	HAYWARD	(\$837,280)	\$434,681	(\$402,599)	Yes	No	PG&E
CONTRA COSTA	CONTRA COSTA COUNTY	\$15,371,163	\$523,635	\$15,894,798	Yes	No	PG&E
CONTRA COSTA	MORAGA	\$1,540,913	\$43,183	\$1,584,096	Unknown	Yes	PG&E
EL DORADO	EL DORADO COUNTY	\$15,297,831	\$538,454	\$15,836,285	Yes	No	PG&E
FRESNO	FRESNO COUNTY (PG&E)	\$12,786,245	\$868,584	\$13,654,829	Yes	No	PG&E
FRESNO	COALINGA	\$1,003,318	\$36,114	\$1,039,432	Yes	No	PG&E
FRESNO	FRESNO	\$19,790,794	\$1,296,133	\$21,086,927	Yes	No	PG&E
FRESNO	KINGSBURG	\$1,127,203	\$33,300	\$1,160,503	Yes	No	PG&E
FRESNO	ORANGE COVE	\$905,819	\$20,661	\$926,480	Yes	Yes	PG&E
FRESNO	PARLIER	\$2,218,305	\$24,134	\$2,242,439	Yes	No	PG&E
FRESNO	REEDLEY	\$3,389,837	\$56,656	\$3,446,493	Yes	No	PG&E
HUMBOLDT	HUMBOLDT COUNTY	\$1,550,059	\$343,624	\$1,893,683	Yes	No	PG&E
KERN	BAKERSFIELD	\$9,089,655	\$806,548	\$9,896,203	Yes	No	PG&E
KERN	CALIFORNIA CITY	\$651,675	\$29,024	\$669,634	No	Yes	PG&E
KERN	DELANO	(\$425,766)	\$74,822	(\$377,236)	No	Yes	PG&E
KERN	MCFARLAND (PG&E)	\$3,459,566	\$16,048	\$3,475,614	Yes	Yes	PG&E
KERN	SHAFTER	\$1,196,449	\$42,622	\$1,239,071	Yes	No	PG&E
MERCED	MERCED COUNTY	\$8,927,361	\$298,996	\$9,226,357	Yes	Yes	PG&E
MONTEREY	MONTEREY COUNTY	\$12,605,728	\$418,223	\$13,023,951	Yes	No	PG&E
MONTEREY	MARINA	\$1,492,810	\$57,330	\$1,550,140	Yes	No	PG&E
MONTEREY	SALINAS	\$8,373,337	\$332,217	\$8,705,554	Yes	No	PG&E
SAN BENITO	HOLLISTER	\$391,758	\$68,232	\$459,990	Yes	No	PG&E
SAN JOAQUIN	STOCKTON	\$10,591,172	\$697,933	\$11,289,105	Yes	No	PG&E
SAN LUIS OBISPO	SAN LUIS OBISPO COUNTY	\$4,551,627	\$502,724	\$5,054,351	Yes	No	PG&E
SAN LUIS OBISPO	ARROYO GRANDE	\$1,768,127	\$59,794	\$1,827,921	Yes	No	PG&E
SAN LUIS OBISPO	PISMO BEACH	\$3,290,865	\$39,746	\$3,330,611	Yes	No	PG&E
SANTA BARBARA	SANTA BARBARA COUNTY (PG&E)	\$5,167,958	\$219,735	\$5,387,693	Yes	No	PG&E
SANTA BARBARA	SANTA BARBARA	\$639,060	\$433,340	\$969,226	No	Yes	PG&E
SANTA BARBARA	SANTA MARIA	\$5,898,931	\$207,595	\$6,106,526	Yes	No	PG&E
SANTA BARBARA	SOLVANG	\$524,666	\$19,918	\$544,584	Yes	No	PG&E
SANTA CLARA	SAN JOSE	\$34,746,386	\$2,263,875	\$37,010,261	Yes	No	PG&E
SANTA CLARA	SUNNYVALE	\$14,137,367	\$438,284	\$14,575,651	Yes	No	PG&E
SANTA CRUZ	SANTA CRUZ COUNTY	\$16,848,173	\$533,060	\$17,381,233	Yes	No	PG&E
SANTA CRUZ	CAPITOLA	\$1,910,768	\$46,538	\$1,957,306	Yes	No	PG&E
SANTA CRUZ	SANTA CRUZ	\$3,268,650	\$206,488	\$3,475,138	Yes	Yes	PG&E
SANTA CRUZ	WATSONVILLE	\$2,774,915	\$113,612	\$2,888,527	Yes	No	PG&E
TULARE	DINUBA	\$1,000,754	\$54,299	\$1,055,053	Yes	No	PG&E
TULARE	PORTERVILLE	\$726,734	\$100,964	\$788,204	No	Yes	PG&E
TULARE	VISALIA	(\$180,105)	\$260,662	(\$15,276)	No	Yes	PG&E
TULARE	DINUBA	\$1,000,754	\$54,299	\$1,055,053	Yes	No	PG&E
TUOLUMNE	TUOLUMNE COUNTY (PG&E)	\$8,175,110	\$307,179	\$8,482,289	Yes	No	PG&E



SCE Jurisdictions

County	Jurisdiction	Balance (12-31-15)	Allocation (2016)	Balance (1-1-16)	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
LOS ANGELES	LOS ANGELES COUNTY	\$28,959,392	\$3,446,767	\$31,472,476	No	Yes	SCE
LOS ANGELES	ALHAMBRA	\$5,564,761	\$434,728	\$5,890,651	No	Yes	SCE
LOS ANGELES	BELL	(\$384,875)	\$134,181	(\$284,201)	No	Yes	SCE
LOS ANGELES	BELL GARDENS	(\$205,804)	\$142,686	(\$100,984)	No	Yes	SCE
LOS ANGELES	BELLFLOWER	\$359,253	\$300,688	\$583,013	No	Yes	SCE
LOS ANGELES	BEVERLY HILLS	(\$618,445)	\$200,294	(\$469,437)	No	Yes	SCE
LOS ANGELES	CARSON	(\$512,958)	\$300,166	(\$297,641)	No	Yes	SCE
LOS ANGELES	CERRITOS	(\$314,733)	\$88,319	(\$251,778)	No	Yes	SCE
LOS ANGELES	CUDAHY	\$71,105	\$73,585	\$125,234	No	Yes	SCE
LOS ANGELES	CULVER CITY	\$742,100	\$199,544	\$889,187	No	Yes	SCE
LOS ANGELES	DOWNNEY	\$1,394,945	\$492,239	\$1,763,522	No	Yes	SCE
LOS ANGELES	GARDENA	(\$2,374,206)	\$290,492	(\$2,164,058)	No	Yes	SCE
LOS ANGELES	GLENDORA	(\$523,721)	\$197,648	(\$380,540)	No	Yes	SCE
LOS ANGELES	HUNTINGTON PARK	\$2,286,482	\$215,464	\$2,445,720	No	Yes	SCE
LOS ANGELES	LA HABRA HEIGHTS	\$143,101	\$23,439	\$160,635	No	Yes	SCE
LOS ANGELES	LA PUENTE	\$2,710,397	\$123,527	\$2,800,689	No	Yes	SCE
LOS ANGELES	LAKEWOOD	\$3,535,690	\$364,708	\$3,804,010	No	Yes	SCE
LOS ANGELES	LANCASTER	\$2,902,246	\$276,843	\$3,085,660	No	Yes	SCE
LOS ANGELES	LONG BEACH	\$13,707,478	\$2,196,472	\$15,304,957	No	Yes	SCE
LOS ANGELES	LYNWOOD	\$2,214,127	\$226,566	\$2,383,691	No	Yes	SCE
LOS ANGELES	MONROVIA	(\$229,209)	\$189,997	(\$88,187)	No	Yes	SCE
LOS ANGELES	MONTEBELLO	(\$1,205,288)	\$257,731	(\$1,017,173)	No	Yes	SCE
LOS ANGELES	MONTEREY PARK	\$1,010,323	\$277,384	\$1,217,060	No	Yes	SCE
LOS ANGELES	NORWALK	\$828,273	\$359,700	\$1,093,862	No	Yes	SCE
LOS ANGELES	POMONA	\$6,936,151	\$445,348	\$7,253,895	No	Yes	SCE
LOS ANGELES	REDONDO BEACH	(\$1,395,619)	\$393,904	(\$1,101,887)	No	Yes	SCE
LOS ANGELES	ROLLING HILLS ESTATES	(\$115,004)	\$28,901	(\$94,121)	No	Yes	SCE
LOS ANGELES	ROSEMEAD	(\$726,378)	\$199,103	(\$578,447)	No	Yes	SCE
LOS ANGELES	SAN GABRIEL	(\$1,148,547)	\$199,089	(\$998,462)	No	Yes	SCE
LOS ANGELES	SANTA MONICA	(\$1,990,287)	\$672,401	(\$1,478,748)	No	Yes	SCE
LOS ANGELES	SOUTH EL MONTE	(\$258,280)	\$101,913	(\$180,900)	No	Yes	SCE
LOS ANGELES	SOUTH GATE	\$3,760,068	\$357,992	\$4,025,220	No	Yes	SCE
LOS ANGELES	SOUTH PASADENA	\$2,207,257	\$146,908	\$2,316,451	No	Yes	SCE
LOS ANGELES	TORRANCE	(\$654,690)	\$694,227	(\$141,805)	No	Yes	SCE
LOS ANGELES	WEST HOLLYWOOD	(\$120,677)	\$329,606	\$129,924	No	Yes	SCE
LOS ANGELES	WESTLAKE VILLAGE	\$152,632	\$17,553	\$165,048	No	Yes	SCE
LOS ANGELES	WHITTIER	\$4,718,457	\$403,422	\$5,015,275	No	Yes	SCE
MONO	MAMMOTH LAKES	(\$232,696)	\$50,302	(\$197,241)	No	Yes	SCE
ORANGE	ORANGE COUNTY (SCE)	(\$207,608)	\$373,843	\$84,285	No	Yes	SCE
ORANGE	BREA	(\$175,275)	\$104,656	(\$102,818)	No	Yes	SCE
ORANGE	BUENA PARK	\$1,518,755	\$284,878	\$1,726,842	No	Yes	SCE
ORANGE	FOUNTAIN VALLEY	\$613,400	\$133,794	\$708,644	No	Yes	SCE
ORANGE	FULLERTON	\$3,486,722	\$412,995	\$3,774,801	No	Yes	SCE
ORANGE	GARDEN GROVE	\$2,632,119	\$573,837	\$3,053,180	No	Yes	SCE
ORANGE	HUNTINGTON BEACH	(\$1,169,709)	\$567,610	(\$761,708)	No	Yes	SCE
ORANGE	LAGUNA BEACH (SCE)	\$2,004,256	\$109,389	\$2,088,705	No	Yes	SCE
ORANGE	NEWPORT BEACH	(\$2,319,686)	\$289,521	(\$2,107,423)	No	Yes	SCE
ORANGE	ORANGE	(\$805,617)	\$393,923	(\$533,497)	No	Yes	SCE
ORANGE	STANTON	(\$187,357)	\$93,094	(\$121,374)	No	Yes	SCE
ORANGE	VILLA PARK	\$26,730	\$13,267	\$36,582	No	Yes	SCE
ORANGE	WESTMINSTER	\$1,971,160	\$239,895	\$2,140,125	No	Yes	SCE
RIVERSIDE	RIVERSIDE COUNTY	\$8,647,589	\$802,407	\$9,209,033	No	Yes	SCE
RIVERSIDE	Canyon Lake	(\$64,411)	\$15,365	(\$55,174)	No	Yes	SCE
RIVERSIDE	Desert Hot Springs	\$724,850	\$67,343	\$772,934	No	Yes	SCE
RIVERSIDE	Hemet	\$526,246	\$123,426	\$597,150	No	Yes	SCE
RIVERSIDE	Indian Wells	\$246,653	\$16,483	\$256,759	No	Yes	SCE
RIVERSIDE	Elsinore, Lake	(\$196,775)	\$52,942	(\$174,412)	No	Yes	SCE
RIVERSIDE	Moreno Valley	\$565,164	\$228,420	\$717,306	No	Yes	SCE
RIVERSIDE	Murietta	(\$116,722)	\$61,334	(\$101,516)	No	Yes	SCE
RIVERSIDE	Palm Springs	(\$1,522,745)	\$215,971	(\$1,365,081)	No	Yes	SCE
RIVERSIDE	San Jacinto	\$128,106	\$46,642	\$151,240	No	Yes	SCE
RIVERSIDE	Temecula	\$284,067	\$71,215	\$310,491	No	Yes	SCE
SAN BERNARDINO COUNTY	SAN BERNARDINO COUNTY	\$2,398,122	\$1,444,049	\$3,491,914	No	Yes	SCE
SAN BERNARDINO COUNTY	Adelanto	(\$70,041)	\$25,034	(\$59,222)	No	Yes	SCE
SAN BERNARDINO COUNTY	Apple Valley	\$204,569	\$198,378	\$336,835	No	Yes	SCE
SAN BERNARDINO COUNTY	Barstow	(\$443,944)	\$87,332	(\$383,918)	No	Yes	SCE
SAN BERNARDINO COUNTY	Chino	\$741,640	\$134,608	\$828,388	No	Yes	SCE
SAN BERNARDINO COUNTY	Fontana	\$2,501,690	\$229,158	\$2,635,268	No	Yes	SCE
SAN BERNARDINO COUNTY	Hesperia	\$1,114,321	\$231,365	\$1,259,729	No	Yes	SCE
SAN BERNARDINO COUNTY	Montclair	(\$457,403)	\$109,193	(\$379,467)	No	Yes	SCE
SAN BERNARDINO COUNTY	Ontario	\$845,522	\$384,535	\$1,113,672	No	Yes	SCE
SAN BERNARDINO COUNTY	Rancho Cucamonga	(\$950,510)	\$237,028	(\$804,057)	No	Yes	SCE
SAN BERNARDINO COUNTY	Redlands	\$1,762,739	\$203,477	\$1,901,481	No	Yes	SCE
SAN BERNARDINO COUNTY	Rialto	(\$946,811)	\$182,307	(\$822,163)	No	Yes	SCE
SAN BERNARDINO COUNTY	Twentynine Palms	(\$249,704)	\$81,259	(\$192,476)	No	Yes	SCE
SAN BERNARDINO COUNTY	Victorville	\$358,102	\$125,786	\$419,877	No	Yes	SCE
SAN DIEGO	SAN DIEGO COUNTY (SCE)	\$1,227	\$151	\$1,332	No	Yes	SCE
SANTA BARBARA	SANTA BARBARA COUNTY (SCE)	(\$2,266,113)	\$237,227	(\$2,092,362)	No	Yes	SCE
VENTURA	CAMARILLO	(\$355,834)	\$134,545	(\$269,650)	No	Yes	SCE
VENTURA	OXNARD	\$3,018,177	\$361,115	\$3,257,921	No	Yes	SCE
VENTURA	PORT HUENEME	(\$295,051)	\$55,578	(\$256,177)	No	Yes	SCE



SDGE Jurisdictions

County	Jurisdiction	Balance (12-31-15)	Allocation (2016)	Balance (1-1-16)	5-Year Plan? (Y/N)	Utility Underground District?(Y/N)	Utility
ORANGE	ORANGE COUNTY (SDG&E)	(\$6,389)	\$6,000	(\$389)	Yes	Yes	SDG&E
ORANGE	DANA POINT	\$1,322,523	\$156,000	\$1,478,523	No	Yes	SDG&E
ORANGE	LAGUNA BEACH (SDG&E)	\$609,408	\$25,200	\$634,608	No	Yes	SDG&E
ORANGE	LAGUNA HILLS (SDG&E)	(\$40,392)	-	#VALUE!	Yes	Yes	SDG&E
ORANGE	LAGUNA NIGUEL (SDG&E)	\$0	\$1,200	\$1,200	No	Yes	SDG&E
ORANGE	MISSION VIEJO (SDG&E)	\$366,830	-	#VALUE!	No	Yes	SDG&E
ORANGE	SAN CLEMENTE (SDG&E)	\$1,079,740	\$213,600	\$1,293,340	No	Yes	SDG&E
ORANGE	SAN JUAN CAPISTRANO (SDG&E)	\$47,740	\$14,400	\$62,140	No	Yes	SDG&E
SAN DIEGO	Carlsbad	\$816,144	\$120,000	\$936,144	No	Yes	SDG&E
SAN DIEGO	Chula Vista	\$135,221	\$2,000,000	\$2,135,221	No	Yes	SDG&E
SAN DIEGO	Coronado	\$1,032,862	\$159,600	\$1,192,462	No	Yes	SDG&E
SAN DIEGO	Del Mar	(\$186,626)	\$46,800	(\$139,826)	No	Yes	SDG&E
SAN DIEGO	El Cajon	\$2,371,464	\$432,000	\$2,803,464	No	Yes	SDG&E
SAN DIEGO	Encinitas	\$1,681,017	\$249,600	\$1,930,617	No	Yes	SDG&E
SAN DIEGO	Escondido	\$1,101,543	\$321,600	\$1,423,143	No	Yes	SDG&E
SAN DIEGO	Imperial Beach	(\$30,910)	\$199,200	\$168,290	No	Yes	SDG&E
SAN DIEGO	La Mesa	\$4,368,936	\$381,600	\$4,750,536	No	Yes	SDG&E
SAN DIEGO	Lemon Grove	\$6,645,818	\$181,200	\$6,827,018	No	Yes	SDG&E
SAN DIEGO	National City	\$4,352,854	\$270,000	\$4,622,854	No	Yes	SDG&E
SAN DIEGO	Oceanside	\$1,901,844	\$307,200	\$2,209,044	No	Yes	SDG&E
SAN DIEGO	Poway	\$1,560,740	\$98,400	\$1,659,140	No	Yes	SDG&E
SAN DIEGO	City of San Diego	\$75,090,863	\$18,069,308	\$93,160,171	No	Yes	SDG&E
SAN DIEGO	San Marcos	(\$362,131)	\$52,800	(\$309,331)	Yes	Yes	SDG&E
SAN DIEGO	Santee	(\$176,034)	\$90,000	(\$86,034)	Yes	Yes	SDG&E
SAN DIEGO	Solana Beach	\$1,070,227	\$39,600	\$1,109,827	No	Yes	SDG&E
SAN DIEGO	Vista	(\$1,773,400)	\$229,200	(\$1,544,200)	Yes	Yes	SDG&E



Appendix E
PGE 2015 Rule 20A Allocations and Balances

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Figure 8 - PGE 2015 Rule 20A Allocations

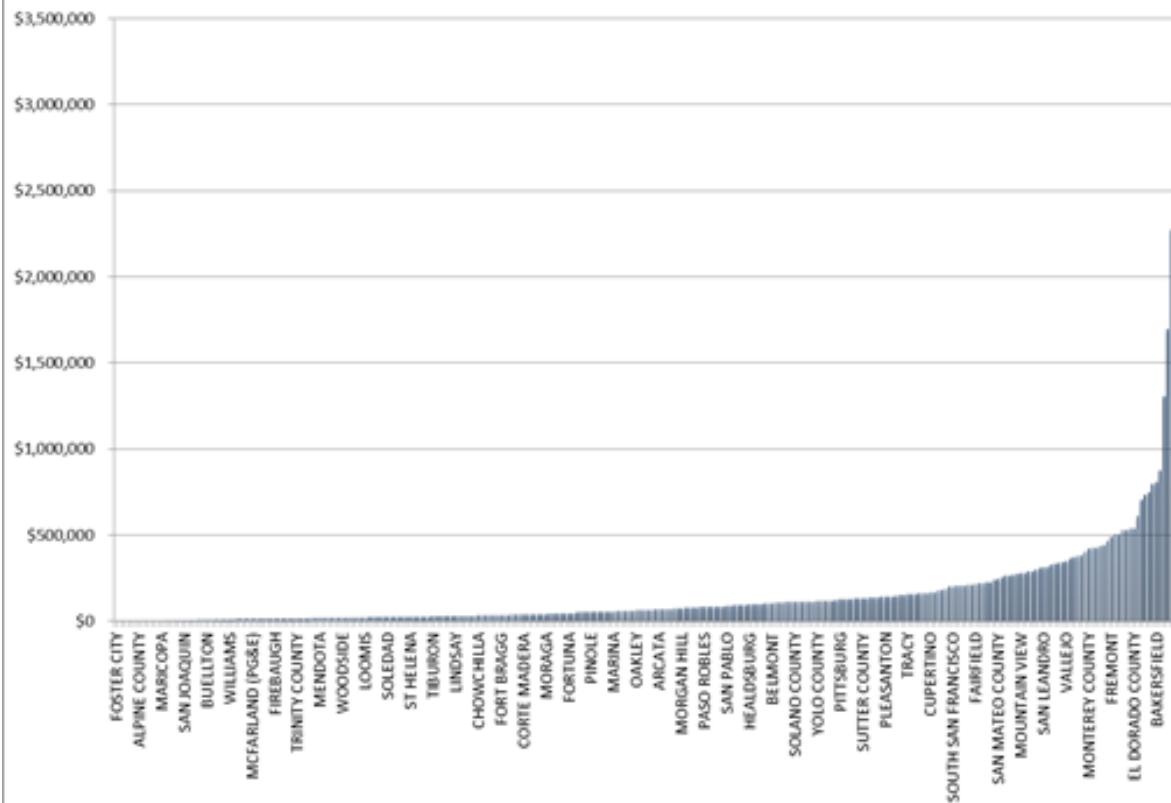
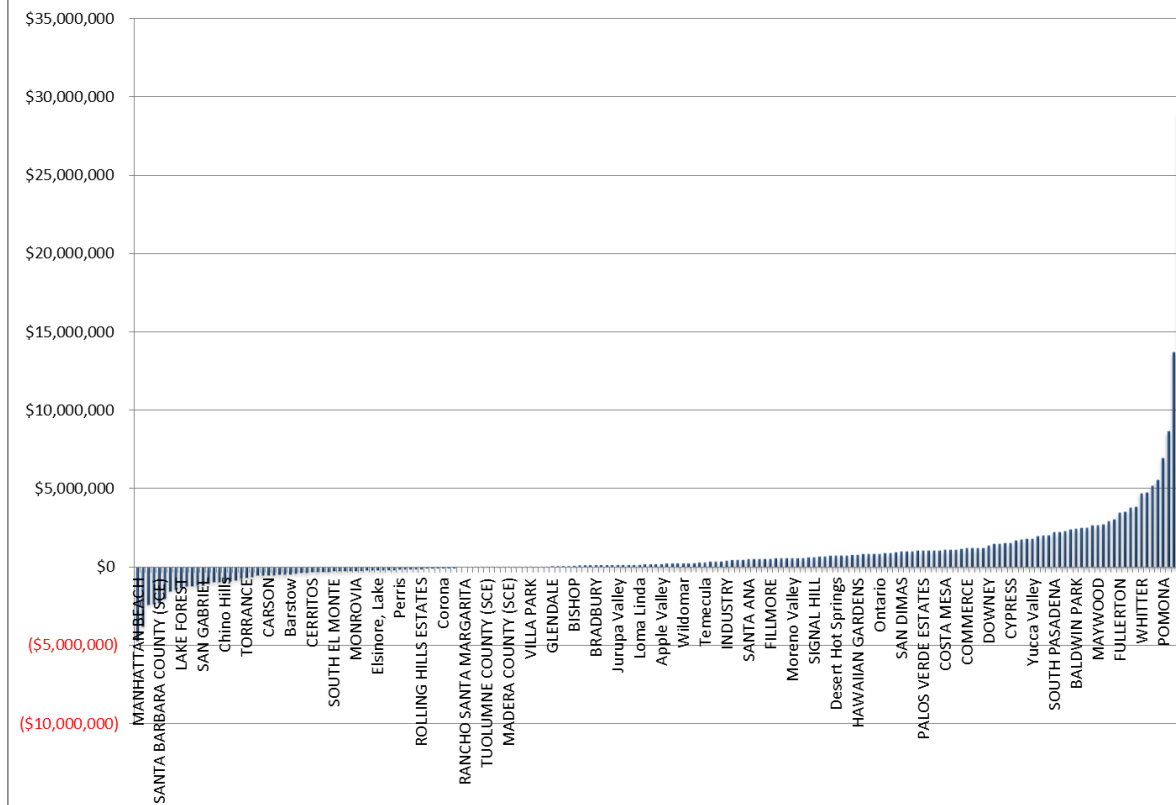


Figure 9 - PG&E 2015 Rule 20A Balances





Appendix F
SCE 2015 Rule 20A Allocations and Balances

DRAFT



Figure 10 - SCE 2015 Rule 20A Allocations

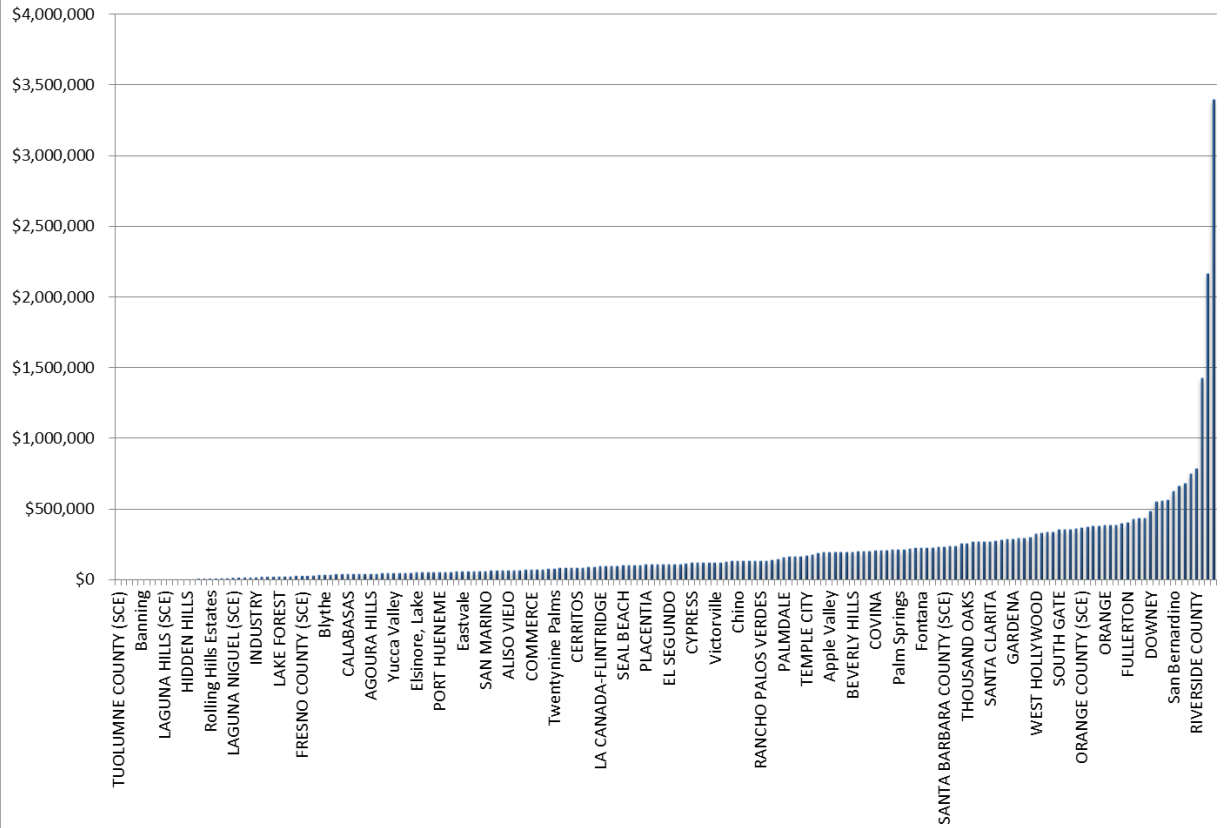
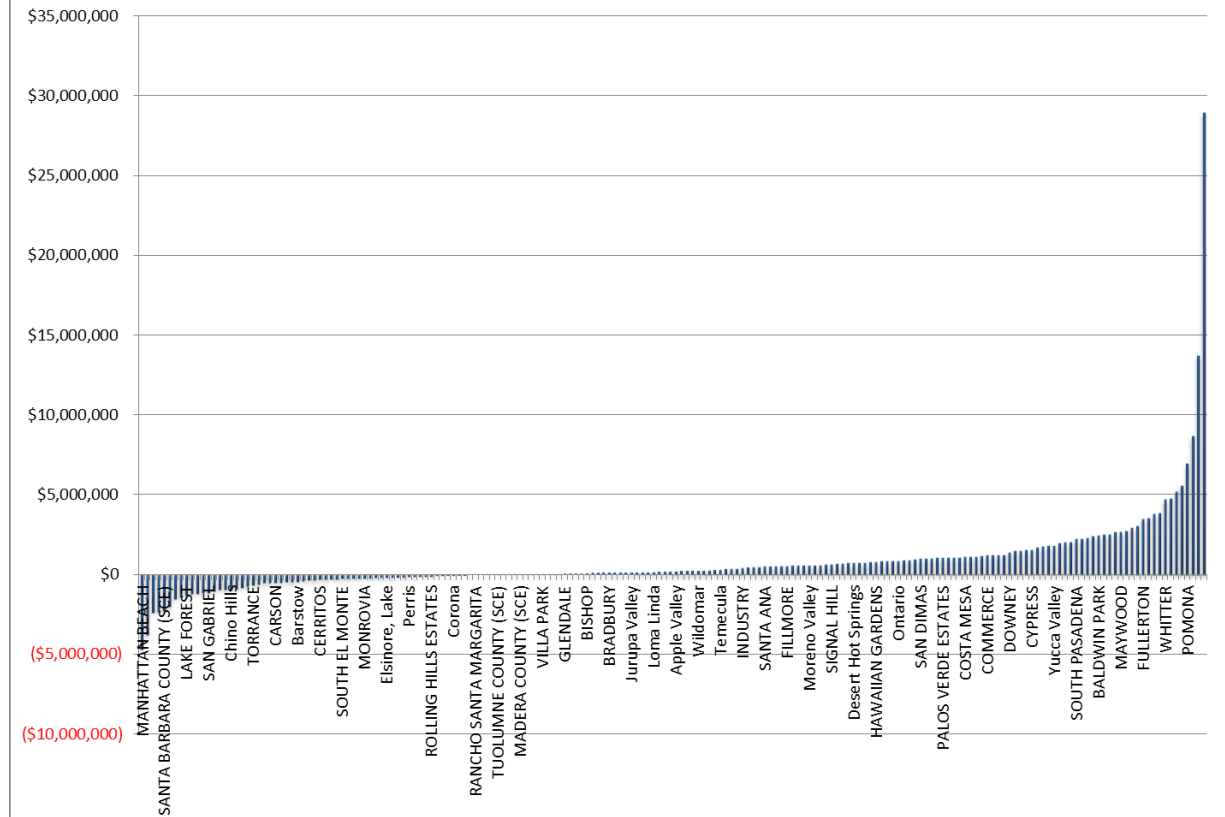


Figure 11 - SCE 2015 Rule 20A Balances





Appendix G
SDGE 2015 Rule 20A Allocations and Balances

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Figure 12- SDGE 2015 Rule 20A Allocation

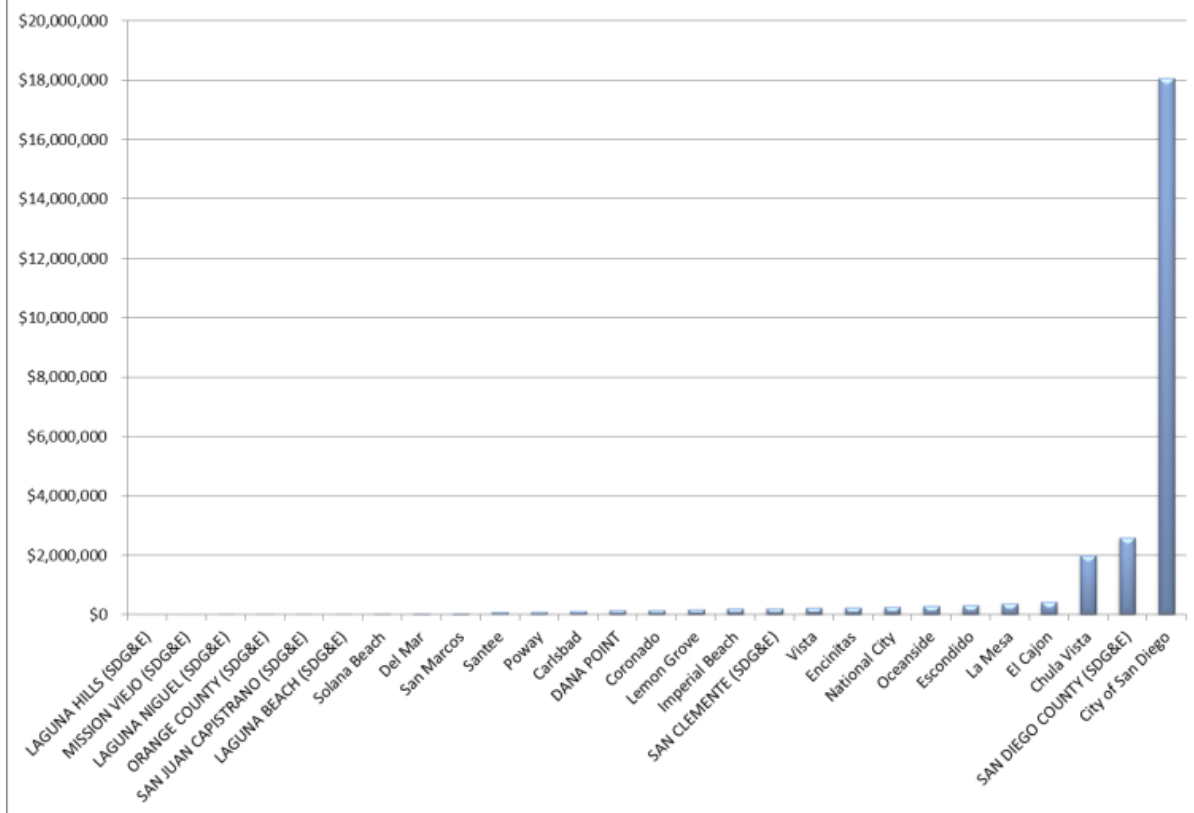


Figure 13 - SDGE Rule 20A 2015 Balances

